

UNITED STATES DISTRICT COURT

for the
Western District of WashingtonIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)Eight (8) Target Locations and Six (6) Target Vehicles,
as more fully described in Attachment A.

Case No. MJ22-572

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

Eight (8) Target Locations and Six (6) Target Vehicles, as more fully described in Attachment A, incorporated herein by reference.

located in the Western District of Washington, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

21 U.S.C. § 841(a)(1)
21 U.S.C. § 841 & 846
18 U.S.C. § 922


Offense Description

Distribution of, and Possession with Intent to Distribute, Controlled Substances
Conspiracy to Distribute Controlled Substances
Felon in Possession of Firearms

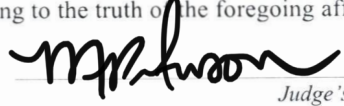
The application is based on these facts:

- ☒ See Affidavit of DEA Special Agent Joseph Cheng, continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.
Applicant's signatureJoseph Cheng, DEA Special Agent
Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 11/28/22
Judge's signatureCity and state: Seattle, WashingtonMichelle L. Peterson, United States Magistrate Judge
Printed name and title

ATTACHMENT A

PROPERTY TO BE SEARCHED

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found.

For physical locations, this includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), and vehicles located within said property or within the residence/location described below.

For vehicles to be searched, this includes all areas of the vehicle, all compartments, and all containers within that vehicle, whether locked or not.

Residences

Target Location 2 (TL2): 6225 84th Place Northeast, Marysville, Washington.

Target Location 2 is a single floor single family residence. The numbers 6225 are affixed vertically to a post near the front door. The red front door faces west into the cul-de-sac. The house is light blue and cream colored with white trim.



1 **Target Location 3 (TL3): 18111 25th Avenue Northeast, Apartment FF105,**
2 **Marysville, Washington.**

3 **Target Location 3** is a two story middle unit in a multi-residence townhome
4 building. Target Location 4 has tan siding with white and gray trim. The garage door
5 is mixed white and gray in color and faces east toward Gregory Landing Lane.
6 “FF105” is affixed to the building next to the garage door. The front door faces south.
7



Target Location 4 (TL4): 3374 Robertson Road, Bellingham, Washington.

Target Location 4 is on the east side of Robertson Road and is a two story single family residence. The residence is blue/gray in color with white trim. The numbers 3374 are affixed above the garage doors. A double and single garage door and a mostly glass front door face Robertson Road.



Target Location 5 (TL5): 2100 Alabama Street Apartment V8, Bellingham, Washington.

Target Location 5 is an apartment complex named the Crimson Hills Townhomes at the intersection of Alabama Street and Woburn Street. Apartment V8 is two stories and faces west toward Valencia Street. V8 is affixed to a post next to a wooden gate across the entry to the residence.



Target Location 6 (TL6): 1511 Willowbrook Place, Bellingham, Washington.

Target Location 6 is a single family residence at the end of Willowbrook Place. The black numbers 1511 are affixed to a white board next to the front door. The house is tan in color with white trim. The red front door and white garage door both face east toward Willowbrook Place.



1 **Target Location 7 (TL7): 4076 Jones Lane, Bellingham, Washington**

2 **Target Location 7** is a two story single-family residence that is dark in color
3 with light colored trim. **Target Location 7** is at the end of a long driveway off of Jones
4 Lane. A dark color garage door and dark colored front door with glass panes face Jones
5 Lane to the west. A small outbuilding sits at the end of the driveway nearest to Jones
6 Lane.



Target Location 8 (TL8): 2100 Halleck Street, Bellingham, Washington

Target Location 8 is a single family single floor residence, cream in color with a brown roof and is located on the east side of the intersection of I Street and Halleck Street. The number 2100 are affixed next to the front door of the residence that faces Halleck Street. The front door is brown in color.



Target Location 9 (TL9): 1512 Iron Street, Bellingham, Washington.

Target Location 9 is a one-story single family residence located on the east side of Iron Street. The house is gray/blue in color with white trim and a white with glass panels front door facing west. The number 1512 are affixed to the residence next to the front door.



For this location, search is only authorized for areas that CASEY LANDIS has direct access, including his personal room or rooms and any common areas (including bathrooms, kitchen, and living areas) to which he has access. Search is not authorized for rooms that CASEY LANDIS does not have direct access (including bedrooms associated with other individuals).

Vehicles

Target Vehicle 1 (TV1): a 2019 Toyota Tacoma bearing Washington license plate C88437V (hereinafter, “**Target Vehicle 1**”). According to the Washington State Department of Licensing (“DOL”), **Target Vehicle 1** is registered to ANJELICA J LOPEZ VILLESICA, at 1628 North 26th Street, Apartment 205 in Mount Vernon, Washington.

Target Vehicle 4 (TV4): a 2017 white BMW 540 sedan bearing Washington license plate CCV6269 (hereinafter, “**Target Vehicle 4**”). According to the DOL **Target Vehicle 4** is registered to ANJELICA J LOPEZ VILLESICA at 6225 84th PL NE, Marysville, Washington.

Target Vehicle 5 (TV5): a 2012 black Lexus IS sedan bearing Washington license plate BSU8484 (hereinafter, “**Target Vehicle 5**”). According to the DOL **Target Vehicle 5** is registered to ENOC MARTINEZ-LOPEZ at 1610 N 26th St, Apt 101, Mount Vernon, Washington.

Target Vehicle 6 (TV6): a 2015 white Dodge Durango bearing Washington license plate BUJ0115 (hereinafter “**Target Vehicle 6**”). According to the DOL **Target Vehicle 6** is registered to Anjelica J LOPEZ VILLESICA at 1628 North 26th Street Apartment 205, Mount Vernon, Washington 98273.

Target Vehicle 7 (TV7): a 2017 black BMW 440i sedan, bearing Washington license plate CEN6820 (hereinafter “**Target Vehicle 7**”). According to the DOL **Target Vehicle 7** is registered to Manuel GARCIA-MUNOZ at 18111 25th Ave NE, Apt FF105, Marysville, Washington 98271.

Target Vehicle 9 (TV9): a 2016 Mercedes sedan, bearing Washington license plate CEX6393 (hereinafter “**Target Vehicle 9**”). According to the DOL **Target Vehicle 9** is registered to Dmytro Volodko at 184th Street Southwest Unit A409, Lynnwood, Washington 98037.

Attachment B

List of Items to be Searched for and Seized

This warrant authorizes the government to search for and seize the following items:

Evidence and/or fruits of the commission of the following crimes: Distribution and Possession with Intent to Distribute Controlled Substances, in violation of Distribution of, and Possession with Intent to Distribute, Controlled Substances, in violation of 21 U.S.C.

§ 841(a)(1); Conspiracy to Distribute, and to Possess with the Intent to Distribute, Controlled Substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846, and Felon in Possession of a Firearm, in Violation of 18 U.S.C. 922, including but not limited to the following:

1. Controlled Substances: Including but not limited to marijuana and cocaine.
2. Drug Paraphernalia: Items used, or to be used, to store, process, package, use, and/or distribute controlled substances, such as plastic bags, cutting agents, scales, measuring equipment, tape, hockey or duffel bags, chemicals or items used to test the purity and/or quality of controlled substances, and similar items.
3. Drug Transaction Records: Documents such as ledgers, receipts, notes, and similar items relating to the acquisition, transportation, and distribution of controlled substances.
4. Customer and Supplier Information: Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, “pay/owe sheets” with drug amounts and prices, maps or directions, and similar items.
5. Cash and Financial Records: Currency and financial records, including bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, vehicle documents, and similar items; and other records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank drafts, cashiers checks, and similar items, and money counters.
6. Photographs/Surveillance: Photographs, video tapes, digital cameras, surveillance cameras and associated hardware/storage devices, and similar items, depicting property

occupants, friends and relatives of the property occupants, or suspected buyers or sellers of controlled substances, controlled substances or other contraband, weapons, and assets derived from the distribution of controlled substances.

7. Weapons: Including but not limited to firearms, magazines, ammunition, and body armor.

8. Codes: Evidence of codes used in the distribution of controlled substances, including but not limited to passwords, code books, cypher or decryption keys, and similar information.

9. Property Records: Deeds, contracts, escrow documents, mortgage documents, rental documents, and other evidence relating to the purchase, ownership, rental, income, expenses, or control of the premises, and similar records of other property owned or rented.

10. Indicia of occupancy, residency, and/or ownership of assets including, but not limited to, utility and telephone bills, canceled envelopes, rental records or payment receipts, leases, mortgage statements, and other documents.

11. Evidence of Storage Unit Rental or Access: rental and payment records, keys and codes, pamphlets, contracts, contact information, directions, passwords or other documents relating to storage units.

12. Evidence of Personal Property Ownership: Registration information, ownership documents, or other evidence of ownership of property including, but not limited to vehicles, vessels, boats, airplanes, jet skis, all terrain vehicles, RVs, and personal property; evidence of international or domestic travel, hotel/motel stays, and any other evidence of unexplained wealth,

13. Individual and business financial books, records, receipts, notes, ledgers, diaries, journals, and all records relating to income, profit, expenditures, or losses, such as:

a. Employment records: paychecks or stubs, lists and accounts of employee payrolls, records of employment tax withholdings and contributions, dividends, stock certificates, and compensation to officers.

b. Savings accounts: statements, ledger cards, deposit tickets, register records, wire transfer records, correspondence, and withdrawal slips.

c. Checking accounts: statements, canceled checks, deposit tickets, credit/debit documents, wire transfer documents, correspondence, and register records.

- d. Loan Accounts: financial statements and loan applications for all loans applied for, notes, loan repayment records, and mortgage loan records.
- e. Collection accounts: statements and other records.
- f. Certificates of deposit: applications, purchase documents, and statements of accounts.
- g. Credit card accounts: credit cards, monthly statements, and receipts of use.
- h. Receipts and records related to gambling wins and losses, or any other contest winnings.
- i. Insurance: policies, statements, bills, and claim-related documents.
- j. Financial records: profit and loss statements, financial statements, receipts, balance sheets, accounting work papers, any receipts showing purchases made, both business and personal, receipts showing charitable contributions, and income and expense ledgers.

14. All bearer bonds, letters of credit, money drafts, money orders, cashier's checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money wrappers, stored value cards, and other forms of financial remuneration evidencing the obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of money.

15. All Western Union and/or Money Gram documents and other documents evidencing domestic or international wire transfers, money orders, official checks, cashier's checks, or other negotiable interests that can be purchased with cash. These documents are to include applications, payment records, money orders, frequent customer cards, etc.

16. Negotiable instruments, jewelry, precious metals, financial instruments, and other negotiable instruments.

17. Documents reflecting the source, receipt, transfer, control, ownership, and disposition of United States and/or foreign currency.

18. Correspondence, papers, records, and any other items showing employment or lack of employment.

19. Telephone books, and/or address books, facsimile machines to include the carbon roll and/or other memory system, any papers reflecting names, addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile, and/or telex numbers, telephone records and bills relating to co-conspirators, sources of supply, customers, financial institutions, and

other individuals or businesses with whom a financial relationship exists. Also, telephone answering devices that record telephone conversations and the tapes therein for messages left for or by co-conspirators for the delivery or purchase of controlled substances or laundering of drug proceeds.

20. Safes and locked storage containers, and the contents thereof which are otherwise described in this document.

21. Tools: Tools that may be used to open hidden compartments in vehicles, paint, bonding agents, magnets, or other items that may be used to open/close said compartments.

22. Cell Phones: Cellular telephones and other communications devices including Blackberries, iPhones and other smartphones may be seized but may only be searched pursuant to a subsequent warrant.

1 4. I have interviewed numerous drug dealers, drug users, and knowledgeable
2 confidential informants about the lifestyles, appearances, and habits of drug dealers and
3 users. I have become familiar with the manner in which narcotics traffickers smuggle,
4 package, transport, store, and distribute narcotics, as well as how they collect and
5 launder drug proceeds. I am also familiar with the manner in which narcotics
6 traffickers use telephones, cellular telephone technology, internet, pagers, coded
7 communications and slang-filled conversations, false and fictitious identities, and other
8 means to facilitate their illegal activities and mislead law enforcement investigations. I
9 have had discussions with other law enforcement personnel about the packaging and
10 preparation of narcotics, the methods of illegal narcotics traffickers, and the security
11 measures that narcotics traffickers often employ. I have examined narcotics customers'
12 supplier lists, pay/owe ledgers maintained by traffickers, and other documentation
13 related to narcotics trafficking. I have also examined documentation of various
14 methods by which methamphetamine, cocaine, marijuana, heroin, and other illicit drugs
15 are smuggled, transported, and distributed. I have participated in hundreds of hours of
16 surveillance of narcotics traffickers. During surveillance, I have personally observed
17 narcotics transactions, counter surveillance techniques, and the ways in which narcotics
18 traffickers conduct clandestine meetings.

19 5. I have also participated in investigations that involved the interception of
20 wire communications, including four investigations of large-scale drug trafficking
21 organizations in which I was the case agent and each of which resulted in the conviction
22 of approximately 20 individuals on federal drug-related charges. In addition to these
23 cases, I have participated in numerous other wiretap investigations in a variety of roles,
24 including by conducting physical surveillance and monitoring intercepted
25 communications. I have been directly involved in the review and deciphering of
26 intercepted coded conversations between narcotics traffickers that were later
27 corroborated by surveillance or by targets' statements. Throughout my law
28

1 enforcement career, I have spoken with, worked with, and gained knowledge from
2 numerous experienced federal, state, and local narcotics officers.

3 PURPOSE OF THIS AFFIDAVIT

4 6. I make this affidavit in support of an application for a warrant authorizing
5 the search of the following target locations and target vehicles, which are further
6 described below and in Attachment A, for evidence, fruits and instrumentalities of the
7 crimes of Distribution of, and Possession with Intent to Distribute, Controlled
8 Substances (21 U.S.C. § 841(a)) and Conspiracy to Distribute Controlled Substances
9 (21 U.S.C. § 846), as further described in Attachment B:

10 a. **Target Location 2 (TL2): 6225 84th Place Northeast,**
11 **Marysville, Washington: Target Location 2** is a single floor single family residence.
12 The numbers 6225 are affixed vertically to a post near the front door. The red front
13 door faces west into the cul-de-sac. The house is light blue and cream colored with
white trim.

14 b. **Target Location 3 (TL3): 18111 25th Avenue Northeast,**
15 **Apartment FF105, Marysville, Washington: Target Location 3** is a two story middle
16 unit in a multi-residence townhome building. Target Location 4 has tan siding with
17 white and gray trim. The garage door is mixed white and gray in color and faces east
toward Gregory Landing Lane. "FF105" is affixed to the building next to the garage
door. The front door faces south.

18 c. **Target Location 4 (TL4): 3374 Robertson Road, Bellingham,**
19 **Washington: Target Location 4** is on the east side of Robertson Road and is a two
20 story single family residence. The residence is blue/gray in color with white trim. The
21 numbers 3374 are affixed above the garage doors. A double and single garage door and
a mostly glass front door face Robertson Road.

22 d. **Target Location 5 (TL5): 2100 Alabama Street Apartment V8,**
23 **Bellingham, Washington: Target Location 5** is an apartment complex named the
24 Crimson Hills Townhomes at the intersection of Alabama Street and Woburn Street.
Apartment V8 is two stories and faces west toward Valencia Street. V8 is affixed to a
post next to a wooden gate across the entry to the residence.

25 e. **Target Location 6 (TL6): 1511 Willowbrook Place,**
26 **Bellingham, Washington: Target Location 6** is a single family residence at the end of
27 Willowbrook Place. The black numbers 1511 are affixed to a white board next to the
28 front door. The house is tan in color with white trim. The red front door and white
garage door both face east toward Willowbrook Place.

1 f. **Target Location 7 (TL7): 4076 Jones Lane, Bellingham,**
 2 **Washington: Target Location 7** is a two story single-family residence that is dark in
 3 color with light colored trim. **Target Location 7** is at the end of a long driveway off of
 4 Jones Lane. A dark color garage door and dark colored front door with glass panes face
 5 Jones Lane.

6 g. **Target Location 8 (TL8): 2100 Halleck Street, Bellingham,**
 7 **Washington: Target Location 8** is a single family single floor residence, cream in
 8 color with a brown roof and is located on the east side of the intersection of I Street and
 9 Halleck Street. The number 2100 are affixed next to the front door of the residence that
 10 faces Halleck Street. The front door is brown in color.

11 h. **Target Location 9 (TL9): 1512 Iron Street, Bellingham,**
 12 **Washington: Target Location 9** is a one-story single family residence located on the
 13 east side of Iron Street. The house is gray/blue in color with white trim and a white
 14 with glass panels front door facing west. The number 1512 are affixed to the residence
 15 next to the front door..

16 i. **Target Vehicle 1 (TV1):** a 2019 Toyota Tacoma bearing
 17 Washington license plate C88437V (hereinafter, "**Target Vehicle 1**"). According to
 18 the Washington State Department of Licensing ("DOL"), **Target Vehicle 1** is
 19 registered to ANJELICA J LOPEZ VILLESICA, at 1628 North 26th Street, Apartment
 20 205 in Mount Vernon, Washington. Investigators believe that **TV1** is being used by
 21 ENOC MARTINEZ LOPEZ ("MARTINEZ") and others to facilitate drug trafficking
 22 activities.

23 j. **Target Vehicle 4 (TV4):** a 2017 white BMW 540 sedan bearing
 24 Washington license plate CCV6269 (hereinafter, "**Target Vehicle 4**"). According to the
 25 DOL **Target Vehicle 4** is registered to ANJELICA J LOPEZ VILLESICA at 6225 84th
 26 PL NE, Marysville, Washington. Investigators believe that **TV4** is being used by ENOC
 27 MARTINEZ LOPEZ ("MARTINEZ") to facilitate drug trafficking activities.

28 k. **Target Vehicle 5 (TV5):** a 2012 black Lexus IS sedan bearing
 Washington license plate BSU8484 (hereinafter, "**Target Vehicle 5**"). According to the
 DOL **Target Vehicle 5** is registered to ENOC MARTINEZ-LOPEZ at 1610 N 26th St,
 Apt 101, Mount Vernon, Washington. Investigators believe that **TV5** is being used by
 ENOC MARTINEZ LOPEZ ("MARTINEZ") to facilitate drug trafficking activities.

 l. **Target Vehicle 6 (TV6):** a 2015 white Dodge Durango bearing
 Washington license plate BUJ0115 (hereinafter "**Target Vehicle 6**"). According to the
 DOL **Target Vehicle 6** is registered to Anjelica J LOPEZ VILLESICA at 1628 North
 26th Street Apartment 205, Mount Vernon, Washington 98273. Investigators believe
 that **TV6** is being used by Enoc MARTINEZ LOPEZ to facilitate drug trafficking
 activities.

1 m. **Target Vehicle 7 (TV7):** a 2017 black BMW 440i sedan, bearing
 2 Washington license plate CEN6820 (hereinafter “**Target Vehicle 7**”). According to the
 3 DOL **Target Vehicle 7** is registered to Manuel GARCIA-MUNOZ at 18111 25th Ave
 4 NE, Apt FF105, Marysville, Washington 98271. Investigators believe that **TV7** is
 5 being used by ENOC MARTINEZ LOPEZ and MANUEL GARCIA MUÑOZ to
 6 facilitate drug trafficking activities.

7 n. **Target Vehicle 9 (TV9):** a 2016 Mercedes sedan, bearing
 8 Washington license plate CEX6393 (hereinafter “**Target Vehicle 9**”). According to the
 9 DOL **Target Vehicle 9** is registered to Dmytro Volodko at 184th Street Southwest Unit
 10 A409, Lynnwood, Washington 98037. Investigators believe that **TV9** is being used by
 11 ENOC MARTINEZ LOPEZ to facilitate drug trafficking activities.

12 7. For each of the Target Locations, authority to search extends to all parts
 13 of the property, including main structure, garage(s), storage structures, outbuildings,
 14 and curtilage, and all vehicles, containers, compartments, or safes located on the
 15 property, whether locked or not, where the items described in Attachment B could be
 16 found. For each Target Location described as an apartment, authority to search extends
 17 to all storage areas associated with the apartment, including on-site storage lockers,
 18 garages, and parking stalls. For each Target Vehicle searched, authority to search
 19 extends to all parts of the vehicle and any cases, containers, compartments, or safes
 20 located in the vehicle, whether locked or not, where the items described in Attachment
 21 B could be found.

22 8. During the execution of this warrant, to secure the premises, agents may
 23 use an unmanned aircraft equipped with a video camera to conduct a cursory visual
 24 inspection (“sweep”) of those places inside the residence that agents are to search and
 25 in which a person might be hiding. The aircraft would provide live images of those
 26 places to be searched, including those in the interior of the house. The unmanned
 27 aircraft does not have recording capability. Use of this capability promotes civilian and
 28 officer safety by providing agents with information about the presence or absence of
 people and/or weapons in portions of the premises prior to entering those areas
 themselves.

SUMMARY OF PROBABLE CAUSE¹

Summary of Investigation

9. As explained further below, the United States, including the DEA, is conducting a criminal investigation regarding possible violations of Distribution of, and Possession with Intent to Distribute, Controlled Substances, in violation of 21 U.S.C. § 841(a)(1); Conspiracy to Distribute, and to Possess with the Intent to Distribute, Controlled Substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846, in Skagit County, Whatcom County, and elsewhere. During the course of the investigation, investigators initially identified Enoc MARTINEZ LOPEZ as a primary source of supply of cocaine, and subsequently found him also to be a source of supply of fentanyl, methamphetamine, and heroin. By reviewing data obtained pursuant to state and federal search warrants, investigators have learned that MARTINEZ LOPEZ and his associates use cellular phones and various mobile applications to conduct their drug distribution business. MARTINEZ LOPEZ has communicated about drug sales via the application “Snapchat” and via his cellular provider’s Short Message Service (SMS), he has collected money in exchange for drugs via the application “Cash App,” and has stored photographs of drugs on his Google account. Individuals associated with ENOC MARTINEZ LOPEZ who purchase controlled substances from him, or who redistribute controlled substances for him, include: Manuel GARCIA MUNOZ, Casey LANDIS, Adam WISNIEWSKI, and Jesse WITTEVEEN. Another individual, Corbin SAUNDERS is a felon who was found in possession of two firearms during this investigation.

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¹ For ease of reading and to avoid repetition, this summary of probable cause is broken into sections describing events, locations, and vehicles. However, it is my intent that the affidavit be read as a whole, with the facts set forth in each section and subsection supporting probable cause for all relevant locations and vehicles for which permission is being sought to search.

1 Tracking Warrants for Phones and Vehicles

2 10. Investigators have received multiple judicial authorizations to track
3 multiple vehicles and phones used by MARTINEZ LOPEZ and associates of
4 MARTINEZ LOPEZ. Only the most recent orders are described below.

5 11. On September 2, 2022, US Magistrate Judge Paula McCandlis signed a
6 warrant for prospective location information (PLI) and a pen register/trap and trace
7 order for Target Telephones 10 through Target Telephone 30. In early September
8 investigators served those warrants for location data. On September 6, 2022,
9 investigators began receiving location information for some of the Target Telephones.

10 12. On September 16, 2022, US Magistrate Judge Paula McCandlis signed a
11 warrant authorizing the use of a cell site simulator to located 17 of the Target
12 Telephones listed in the PLI warrant described above.

13 13. To date, investigators have utilized the cell site simulator and location
14 data to track, locate and identify multiple members of the MARTINEZ LOPEZ DTO.
15 Some of the cell phone location information and cell site simulator usage is described
16 below.

17 14. On September 29, 2022, US Magistrate Judge Paula McCandlis signed a
18 tracking warrant authorizing the tracking of **TV1, TV3, TV4, and TV5**. Investigators
19 have utilized the listed tracking devices to track the whereabouts of MARTINEZ
20 LOPEZ and Manuel GARCIA MUNOZ. The tracking devices have enable
21 investigators to identify new residences of MARTINEZ LOPEZ's drug trafficking
22 associates. Some of the tracking information is described below.

23 15. On October 31, 2022, US Magistrate Judge Paula McCandlis signed a
24 warrant for prospective location information and pen register/trap and trace for 12 cell
25 phones, many of which are discussed below. Additionally authorized at this time was
26 location tracking for **TV1, TV3, TV4, TV5, TV6 and TV7**. As discussed below,
27 investigators have observed MARTINEZ LOPEZ drive numerous vehicle during his
28

1 drug trafficking activities and MARTINEZ LOPEZ does not appear to have any
2 discernable pattern to which vehicle he drives on any given day.

3 April 18, 2022 Arrest of Adam WISNIEWSKI

4 16. On April 18, 2022, investigators were conducting surveillance of Enoc
5 MARTINEZ LOPEZ at the Silver Reef Casino in Whatcom County. Investigators
6 observed an individual, later identified as Adam WISNIEWSKI get into MARTINEZ
7 LOPEZ's gray Toyota pickup truck (TV1). Investigators followed MARTINEZ
8 LOPEZ and WISNIEWSKI to a nearby gas station, where they remained a short
9 amount of time before returning the Silver Reef Casino. Investigators observed
10 WISNIEWSKI get out of the MARTINEZ LOPEZ's pickup truck (TV1) and
11 MARTINEZ LOPEZ drive away from the area. A short while later, as WISNIEWSKI
12 was walking away from the Silver Reef Casino, investigators observed WISNIEWSKI
13 discard an object onto the ground. Investigators recovered this object which they
14 determined to be blue pills marked "M30," which they believed to be fentanyl pills.
15 WISNIEWSKI was then arrested. During a search incident to arrest, investigators
16 recovered approximately 233 gross grams of suspected fentanyl pills, 68.75 gross grams
17 of fentanyl powder², which was purple in color and a firearm (Harrington & Richardson
18 [Heckler & Koch], Model HK4, serial number HR06139) amongst other items.
19 WISNIEWSKI was released after the interview discussed below.

20 17. In a post Miranda statement, WISNIEWSKI told investigators that he had
21 met "V" earlier in the day and obtained 1,000 "blues" and a sample of fentanyl powder,
22 which was purple in color. Based on the investigation to date, investigators know that
23 MARTINEZ LOPEZ goes by "Victor" with some of his drug trafficking associates.

24
25
26 ² Due to its potency, potential for accidental exposure and other officer safety concerns, investigators do not
27 routinely field test fentanyl. In some select instances, investigators have the equipment necessary to safely field
28 test fentanyl and for those instances it is documented as such. When a seized substance has not been field tested
but is identified as fentanyl, this determination is based on the training and experience of the officer, the
appearance of the pills or powder in question, and the context of the seizure itself.

1 Based on training and experience, I know that “blues” is commonly used code for
2 fentanyl pills marked “M30.”

3 June 23, 2022 Arrest of Adam WISNIEWSKI

4 18. On June 23, 2022, Everson Police Department, assisted by Whatcom
5 County Deputies, arrested WISNIEWSKI in Everson, Whatcom County. Found in
6 WISNIEWSKI’s possession at the time of his arrest were two firearms (Sig Sauer,
7 Model P320 Carry, serial number 58B025078, and a Ruger, Model LC9S, serial
8 number 329-54468) and approximately 60 gross grams of pills marked “M30,”
9 suspected to contain fentanyl. In the vehicle at time of WISNIEWSKI’s arrest was
10 Jessica SWOPE. WISNIEWSKI requested to speak with a Drug Task Force Detective.

11 19. In a post Miranda statement, WISNIEWSKI provided information about
12 “V” or “Victor” who was a drug supplier. WISNIEWSKI showed investigators a
13 contact stored in his phone as “Big Dog V” with the phone number 360-982-8719
14 (TT10), which WISNIEWSKI said was for “Victor.” As discussed above, investigators
15 believe “Victor” to be the MARTINEZ LOPEZ and MARTINEZ LOPEZ to be the user
16 of 360-982-8719 (TT10).

17 Search Warrant on Verizon Wireless accounts 360-982-8719 (TT10) and 206-573-2914

18 20. On August 12, 2022, US Magistrate Judge Brian A Tsuchida signed a
19 search warrant authorizing the search for records related to Verizon Wireless records
20 related to 360-982-8719 (TT10) and 206-573-2914, both believed to be used by Enoc
21 MARTINEZ LOPEZ. Investigators subsequently served this warrant on Verizon
22 wireless. On August 22, 2022, investigators received records from Verizon Wireless.
23 No SMS content was received for 206-573-2914. SMS content was received for 360-
24 982-8719 (TT10) and these messages ranged from June 30, 2022, through August 12,
25 2022, with several multi day gaps in between the records. Some of the messages
26 received pursuant to this search warrant are discussed in the sections below.

21. According to Verizon Wireless records, 360-982-8719 (TT10) is subscribed to Vic MARTINEZ at 1628 North 26th Street, Mount Vernon, Washington 98273 with an activation date of May 16, 2022.

August 31, 2022 Controlled Purchase from MARTINEZ LOPEZ

22. On August 31, 2022, a Whatcom Gang and Drug Task Force (WGDTF) Confidential Source (CS5)³ met with investigators to attempt to purchase 1,000 fentanyl pills and one ounce of heroin from MARTINEZ LOPEZ. CS5 spoke to MARTINEZ LOPEZ telephonically to arrange the controlled purchase. Investigators searched CS5 and CS5's vehicle for contraband and none was found. CS5 was provided \$2,150 in pre-recorded buy funds. Investigators followed CS5 to the meeting location in Whatcom County and CS5 was not observed meeting with any other individuals prior to meeting with MARTINEZ LOPEZ. CS5 met with MARTINEZ LOPEZ who was driving a black Lexus (WA/BSU8484) (**Target Vehicle 5**). After the meeting investigators followed CS5 to a pre-determined location, where investigators were given approximately 197 gross grams of suspected fentanyl pills and 55 gross grams of suspected heroin from CS5. CS5 and CS5's vehicle were searched for contraband and none was found.

Messages between MARTINEZ LOPEZ and WITTEVEEN (TT21)

23. According to toll analysis, MARTINEZ LOPEZ (TT10) had been in contact with 360-603-1960 (TT21) used by Jesse WITTEVEEN approximately 144 times between July 26, 2022, and August 19, 2022.

24. On July 30, 2022, MARTINEZ LOPEZ (TT10) and the user of 360-603-1960 (TT21) exchanged the following messages:

³ CS5 has prior felony convictions for a controlled substance violations and attempting to elude. CS5 is working in exchange for charges related to a recent State of Washington arrest not being filed. During a surveillance conducted in October 2022, investigators observed the vehicle used by CS5 during this controlled purchase and the controlled purchase on November 9, 2022 at a Bellingham residence that MARTINEZ LOPEZ was observed at. Investigators did not see CS5 at that residence or in that vehicle during that October 2022 surveillance.

1	7/30/2022 19:57	Incoming	3606031960	"Hey I want 2 of blue berry's boats and 1 of upper "
2	7/30/2022 20:20	Outgoing	3606031960	"Ok"
3	7/30/2022 20:58	Incoming	3606031960	"Where are we meeting at "
4	7/30/2022 20:59	Incoming	3606031960	"How long "
5	7/30/2022 21:20	Outgoing	3606031960	"Come to Marysville "
6	7/30/2022 21:29	Incoming	3606031960	"I was two off sorry"
7	7/30/2022 21:45	Incoming	3606031960	"Where are we meeting at "

25. Based on training and experience, I know that "blue berry" is commonly used code for "m30" pills, typically containing fentanyl, "boat" is commonly used code for 1,000 pills and "upper" is likely code for some sort of stimulant, possibly cocaine or methamphetamine. In this conversation, investigators believe that MARTINEZ LOPEZ and the user of 360-603-1960 (TT21) ultimately meet for MARTINEZ LOPEZ to provide 2,000 fentanyl pills and 1 unit of some type of drug to the user of 360-603-1960 (TT21).

26. On August 1 and 2, 2022, MARINEZ LOPEZ (TT10) and the user of 360-603-1960 (TT21) exchanged the following messages:

15	8/1/2022 22:13	Incoming	3606031960	"I'm ready with 10"
16	8/1/2022 22:16	Outgoing	3606031960	"Ok I'm in burlington"
17	8/1/2022 22:20	Incoming	3606031960	"I'm on my way "
18	8/1/2022 22:40	Incoming	3606031960	"And can I use a duffle bag "
19	8/1/2022 22:40	Incoming	3606031960	"I forgot mine "
20	8/1/2022 22:40	Outgoing	3606031960	"Give me 30 min bro I'm coming down from the mountains "
21	8/1/2022 22:41	Incoming	3606031960	"OK I just am leaving bham"
22	8/1/2022 23:05	Incoming	3606031960	" What's up home "
23	8/1/2022 23:05	Incoming	3606031960	"Homie"
24	8/1/2022 23:06	Incoming	3606031960	"Where am I going "
25	8/1/2022 23:07	Outgoing	3606031960	"Mount vernon"
26	8/1/2022 23:07	Incoming	3606031960	"OK where "
27	8/1/2022 23:14	Outgoing	3606031960	"Same apartments bro "
28	8/1/2022 23:14	Outgoing	3606031960	"1521 n 26th st "
	8/1/2022 23:14	Incoming	3606031960	"In Burlington "
	8/1/2022 23:58	Outgoing	3606031960	"Counted 9,475"
	8/1/2022 23:58	Incoming	3606031960	"Really "
	8/1/2022 23:58	Incoming	3606031960	"Can't be "

8/1/2022 23:59	Outgoing	3606031960	"It is 1125 added to the bill"
8/2/2022 0:01	Outgoing	3606031960	"2,025 last bill + 1,125= 3150 new bill"

27. Based on training and experience, I believe that "10" is reference to \$10,000 that the user of 360-603-1960 (TT21) is going to provide to MARTINEZ LOPEZ for the purchases of obtaining drugs. Based on the conversation, investigators believe that the two individuals met and the user of 360-603-1960 (TT21) provided MARTINEZ LOPEZ \$9,475, was provided an unknown quantity of drugs and owed MARTINEZ LOPEZ \$3,150 for drugs provided to the user of 360-603-1960 (TT21)

28. On August 12, 2022, MARINEZ LOPEZ (TT10) and the user of 360-603-1960 (TT21) exchanged the following messages:

8/12/2022 20:40	Outgoing	3606031960	"10 min away"
8/12/2022 20:54	Incoming	3606031960	"Hey you dump truck i got 1200 more so 5100 i need three boats and one p of other"
8/12/2022 20:55	Outgoing	3606031960	"I'm pulling up"

29. Based on training and experience, I believe that the user of 360-603-1960 (TT21) told MARTINEZ LOPEZ that they had \$5,100 for MARTINEZ LOPEZ and wanted 3,000 fentanyl pills and one "p," likely one pound, of another type of drug.

30. In October 2022, investigators recognized that WITTEVEEN stopped using TT21 and identified 360-660-4383 as WITTEVEEN's new number. On October 11, 2022, a Whatcom County Superior Court Judge approved a search warrant and court order authorizing investigators to obtain location information for WITTEVEEN's 360-660-4383. Investigators served the warrant and began receiving information shortly thereafter.

November 1 & 2, 2022 Surveillance of MARTINEZ LOPEZ and Jesse WITTEVEEN and recovery of 959 gross grams of methamphetamine and 346 gross grams of suspected fentanyl pills discarded by WITTEVEEN.

31. On November 1, 2022, investigators conducted surveillance on MARTINEZ LOPEZ. Investigators observed that MARTINEZ LOPEZ was driving his white BMW (TV4). Investigators followed MARTINEZ LOPEZ from his residence in Marysville, Washington to a business parking lot in Marysville, Washington where

1 investigators observed MARTINEZ LOPEZ meet with the occupant of another vehicle
2 for a short period of time, discussed below. Based on training and experience,
3 investigators believe that this was a drug transaction conducted by MARTINEZ
4 LOPEZ. Investigators observed MARTINEZ LOPEZ's white BMW (TV4) drive away
5 from the parking lot, investigators did not follow the white BMW (TV4). A short while
6 later, investigators observed the white BMW parked in front of 18111 25th Avenue
7 Northeast, Apartment FF105, Marysville, Washington (**Target Location 3**). Based on
8 this investigation, investigators know that MARTINEZ LOPEZ frequents this address
9 before and after drug transactions.

10 32. Investigators observed MARTINEZ LOPEZ's white BMW (TV4) depart
11 the area of Apartment FF105 (**Target Location 3**) and drive toward Mount Vernon,
12 Washington. Investigators followed MARTINEZ LOPEZ's white BMW to several
13 locations in Mount Vernon, Washington before temporarily losing sight of MARTINEZ
14 LOPEZ's white BMW (TV4).

15 33. In the afternoon of November 1, 2022, WITTEVEEN's phone was not
16 providing location information. At approximately 9:05 PM, investigators began
17 receiving information for WITTEVEEN's phone and it was located in the area of 8363
18 Holly Lane, Maple Falls, Washington (**Target Location 1**).

19 34. At approximately 10:05 PM, location data for WITTEVEEN's phone
20 indicated that WITTEVEEN had left the area of Target Location 1. Location data for
21 WITTEVEEN's phone later indicated that WITTEVEEN was in the area of Walmart in
22 Mount Vernon Washington. Investigators search the area parking lots for vehicle
23 known to be used by WITTEVEEN. Investigators observed a maroon Nissan Murano
24 (Target Vehicle 8) in the Walmart parking lot and saw a male wearing a flat brimmed
25 hat and female get into and start the Nissan Murano (Target Vehicle 8). Investigators
26 then observed a white Honda sedan park next to the Nissan Murano and female get out
27 of the white Honda and get into the rear passenger seat of the Nissan Murano. At
28 approximately 10:51 PM, investigators observed both vehicles drive out of the parking

1 lot and shortly thereafter observed that location data for WITTEVEN's phone was
2 travelling with the two vehicles. Investigators observed both vehicles eventually split
3 up and investigators continued to follow to Nissan Murano (Target Vehicle 8).

4 35. Investigators followed the Nissan Murano (Target Vehicle 8) until it
5 parked in the parking lot of an apartment complex in Mount Vernon, Washington.
6 Investigators relocated MARTINEZ LOPEZ's white BMW (TV4) in Mount Vernon,
7 Washington, and followed it until approximately 11:25 PM, when investigators
8 observed it park at an apartment complex near where the Nissan Murano (Target
9 Vehicle 8) parked. A short time later, investigators observed the Nissan Murano
10 (Target Vehicle 8) drive toward MARTINEZ LOPEZ's white BMW (TV4).
11 Investigators then observed the Nissan Murano (Target Vehicle 8) parked near
12 MARTINEZ LOPEZ's white BMW. Investigators saw MARTINEZ LOPEZ standing
13 near the Nissan Murano (Target Vehicle 8) near a male who was wearing a flat brim
14 hat.

15 36. At approximately 11:35 PM, investigators observed MARTINEZ
16 LOPEZ's white BMW (TV4) drive away from the apartment complex parking lot
17 followed shortly by the Nissan Murano (Target Vehicle 8). Investigators followed the
18 Nissan Murano (Target Vehicle 8) to a nearby gas station where investigators observed
19 the white Honda pull in and park near the Nissan Murano (Target Vehicle 8).
20 Investigators positively identified the male from the Nissan Murano (Target Vehicle 8)
21 as Jesse WITTEVEEN via a booking photograph. Investigators observed both vehicles
22 drive away from the gas station in tandem. Investigators followed both vehicles and
23 observed both vehicles stop on the side of the road and reverse direction of travel, drive
24 in a direction opposite their ultimate destination and drive significantly below the
25 posted speed limit. Based on training and experience, I know that driving in this
26 manner is consistent with conducting counter surveillance attempting to identify law
27 enforcement surveillance units. The vehicles eventually split up and investigators
28 continued to follow the Nissan Murano (Target Vehicle 8) into Sedro Woolley,

1 Washington where it stopped at a gas station. Investigators observed the Nissan
2 Murano leave the gas station, drive into and stop on the side of the road in a
3 neighborhood. Investigators lost sight of the Nissan Murano (Target Vehicle 8) as it
4 drove north on Highway 9 toward Maple Falls, Washington. Investigators believe that
5 the Nissan Murano was driving at a high rate of speed as investigators were unable to
6 catch up to the Nissan Murano (Target Vehicle 8).

7 37. Sometime later, Whatcom County Deputies located the Nissan Murano
8 (Target Vehicle 8) as it drove through Van Zandt, Washington. The most direct route
9 between Sedro Woolley and Van Zandt is to drive north on Highway 9. Deputies
10 attempted to stop the Nissan Murano (Target Vehicle 8) and it did not stop. In an
11 attempt to stop the vehicle, deputies successfully deployed spike strips and the vehicle
12 continued to drive for several miles before the vehicle was ultimately stopped. While
13 deputies were attempting to stop the Nissan Murano (Target Vehicle 8), deputies
14 observed a white bag being thrown out of the passenger side window of the vehicle.
15 This occurred within Whatcom County. Deputies recovered a white bag from the
16 approximate location where deputies observed the bag being thrown out of the Nissan
17 Murano (Target Vehicle 8) window. This bag was found to contain approximately 959
18 gross grams of methamphetamine, which field-tested positive for the presence of
19 methamphetamine and 346 gross grams of fentanyl pills. The driver of the vehicle was
20 identified as Jesse WITTEVEEN and the passenger was identified as Jennifer
21 MCCOSKEY. Both WITTEVEEN and MCCOSKEY were booked into Whatcom
22 County jail. The Nissan Murano (Target Vehicle 8) was towed to Whatcom County
23 Sheriff's Office facility and secured pending a search warrant.

24 November 3, 2022 Search of WITTEVEN's Vehicle and Residence; seizure of 138
25 gross grams of fentanyl pills and approximately 174 gross grams of methamphetamine

26 38. On November 3, 2022, US Magistrate Judge Paula McCandlis signed a
27 search warrant authorizing the search of WITTEVEN's vehicle and residence.
28

1 39. On November 3, 2022, investigators executed the search warrant on
 2 WITTEVEN's vehicle. In a safe on the front passenger floorboard, investigators found
 3 approximately 138 gross grams of suspected fentanyl pills and approximately 174 gross
 4 grams of suspected methamphetamine. Multiple cell phones and various ammunition
 5 was also found in the vehicle.

6 40. On November 4, 2022, investigators executed the search warrant at
 7 WITTEVEN's residence. At the residence, investigators found approximately 35 gross
 8 grams of suspected methamphetamine, multiple cell phones, miscellaneous firearm
 9 parts and a significant quantity of ammunition.

10 November 9, 2022 Controlled Purchase of 170 gross grams of suspected fentanyl pills
 11 from MARTINEZ LOPEZ

12 41. On November 9, 2022, CS5 met with investigators to attempt to purchase
 13 1,000 fentanyl pills from MARTINEZ LOPEZ. Investigators searched CS5 and CS5's
 14 vehicle for contraband and none was found. CS5 was provided a concealed recording
 15 device and \$1,400 in pre-recorded buy funds. CS5 spoke to MARTINEZ LOPEZ on
 16 360-982-8719 (TT10). Investigators followed CS5 to the meeting location in Skagit
 17 County and CS5 was not observed meeting with any other individuals prior to meeting
 18 with MARTINEZ LOPEZ⁴. CS5 met with MARTINEZ LOPEZ who was driving a
 19 white Mercedes (WA/CEX6393) (**Target Vehicle 9**). After the meeting investigators
 20 followed CS5 to a pre-determined location, where investigators got approximately 170
 21 gross grams of suspected fentanyl pills and the recording devices from CS5. The CS5
 22 and CS5's vehicles were searched for contraband and none was found.

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 28 ⁴ CS5 used the restroom in an area business and was observed by investigators while doing so.

TARGET LOCATION 2:

6225 84TH PLACE NORTHEAST, MARYSVILLE, WASHINGTON

Records related to Target Location 2

42. According to Snohomish Public Utility District Records on June 3, 2022, the customer listed for **Target Location 2** was Enoc MARTINEZ LOPEZ with a mailing address of 6225 84th Place Northeast, Marysville, Washington 98270 (**Target Location 2**). These records indicate that service started on April 2, 2022, and list a phone number of 360-488-8184.

43. Court authorized location data for MARTINEZ LOPEZ's vehicles and pole camera video indicated that most of these vehicles are parked at **Target Location 2** during the early morning hours almost every day. Investigators believe that **Target Location 2** is the residence of MARTINEZ LOPEZ.

August 22, 2021 Three pounds of cocaine seized from Target Vehicle 1

44. During summer of 2021, a court-authorized GPS tracker was installed on MARTINEZ LOPEZ's **Target Vehicle 1**. In August 2021, location information indicated that **Target Vehicle 1** had driven to California. As the vehicle detectives were alerted that the Tacoma had travelled south to California. On or about August 22, 2021, **Target Vehicle 1** was stopped in Manteca, California.

45. The driver of the Tacoma provided a false identity, though officers later learned through fingerprint records that the driver was Santiago ROBLES TEJADA. A narcotics K9 was on scene and alerted to the presence of a controlled substance in the Tacoma. Officers searched the Tacoma and located and seized approximately three pounds of cocaine that was vacuumed-sealed and wrapped in duct tape and layers of grease and plastic.

46. The Manteca officers also conducted a search warrant on ROBLES TEJADA'S cell phone. Investigators found Spanish language text messages indicating that ROBLES TEJADA was in contact with phone number 360-488-6007. Subscriber records from T-Mobile indicated that, at the time of the text messages, this phone was

1 subscribed to Enoc MARTINEZ at 1628 North 26th Street, Apartment 205, in Mount
 2 Vernon, Washington. In addition, ROBLES TEJADA was also texting a contact for an
 3 unknown individual listed as “QUINTERO” on phone number 206-880-8763. ROBLES
 4 TEJADA and “QUINTERO” had numerous text messages appearing to use coded
 5 language to discuss drug quantity and pricing.

6 47. Sometime after the traffic stop, LOPEZ VILLESICA retrieved **Target**
 7 **Vehicle 1** from Manteca police. Tracking data and surveillance then showed that
 8 MARTINEZ LOPEZ began to drive the Tacoma and resumed his regular meetings with
 9 known drug traffickers.

10 48. According to T-Mobile records the subscriber changed the account’s
 11 phone number from 360-488-6007 to 360-488-8184 on or about August 26, 2021, just
 12 days after the seizure of drugs from the Tacoma. Additionally, the IMEI listed for both
 13 telephone numbers was 352625660856650. This indicates that MARTINEZ LOPEZ
 14 simply changed his phone number without changing his actual cellular phone. As
 15 discussed above, 360-488-8184 is the phone number listed on the Snohomish Public
 16 Utility District records for **Target Location 2**.

17 18 **TARGET LOCATION 3:**

19 **18111 25TH AVENUE NORTHEAST APARTMENT FF105, MARYSVILLE,**
 20 **WASHINGTON**

21 Records related to Target Location 3

22 49. According to Snohomish Public Utility District Records on May 20,
 23 2022, the customer listed for **Target Location 3** was Oscar Lazaro with a mailing
 24 address of 18111 25th Avenue Northeast Apartment FF105, Marysville, Washington
 25 (**Target Location 3**). These records indicate that service started on May 19, 2022 and
 26 list a phone number of 360-399-0341.

27 50. According to the DOL, **Target Vehicle 7** is registered to Manuel
 28 GARCIA-MUNOZ at 18111 25th Ave NE, Apt FF105, Marysville, Washington 98271.

51. As discussed below, in June 2022, investigators conducted a controlled purchase of heroin from GARCIA MUNOZ while GARCIA MUNOZ was driving a blue Honda Civic (Target Vehicle 3). After the controlled purchase, investigators ultimately followed GARCIA MUNOZ to **Target Location 3**. Also in June 2022, investigators observed GARCIA MUNOZ arrive in a blue Honda Civic (Target Vehicle 3) and walk into **Target Location 3**. In July 2022, investigators observed the blue Honda Civic (Target Vehicle 3) parked in the garage of **Target Location 3**. Based on these observations, investigators believe that GARCIA MUNOZ lives at **Target Location 3**.

52. In addition to being GARCIA MUNOZ's residence, investigators believe that **Target Location 3** is a drug and/or money stash location for the MARTINEZ LOPEZ DTO. As discussed below, MARTINEZ LOPEZ frequently stops at **Target Location 3** prior to driving to Bellingham and/or Mount Vernon and conducting suspected drug transactions at various residences or parking lots.

June 2, 2022 US Currency seized from Armando PATINO

53. On June 2, 2022, investigators observed GARCIA MUÑOZ's 2018 blue Honda Civic (TV3) arrive at **Target Location 3**. Investigators then observed GARCIA MUNOZ get out of TV3, manually lift the garage door, stepped inside the garage, and close the door. A few hours later, investigators at MARTINEZ LOPEZ's residence (**Target Location 2**) observed MARTINEZ LOPEZ get into **Target Vehicle 4** and drive away. Agents followed **Target Vehicle 4** and saw it arrive at the **Target Location 3** and MARTINEZ LOPEZ enter the residence carrying a water bottle and a black Nike backpack. About an hour and a half later, investigators observed MARTINEZ walk out of the residence with a black shoe box with the letters "BOSS" on the side and top, and carrying what appeared to be the same Nike backpack he had earlier. He placed the shoe box on the front passenger seat of **Target Vehicle 4** and the backpack on the rear passenger seat and drove away. Agents followed **Target Vehicle 4** to a grocery store parking lot, where it parked next to a green Mini Cooper with

1 Washington license plate BXE7471. Agents ultimately identified the driver of the Mini
2 Cooper as Armando PATINO, and the passenger as Braulio ANTONIO GARDUNO.
3 MARTINEZ took the “BOSS” shoebox from the front passenger seat of the white
4 BMW and handed it to PATINO before returning to the white BMW and driving away.

5 54. As the Mini Cooper drove away from the grocery store parking lot, it was
6 stopped. A narcotics detecting K9 alerted to the presence of narcotics the odor of
7 narcotics emanating from the Mini Cooper. Investigators searched the Mini Cooper and
8 found a “BOSS” shoebox contained \$29,020.00 in US Currency.

9 June 15, 2022 Controlled Purchase of Heroin from GARCIA MUNOZ

10 55. On June 15, 2022, a Whatcom County Drug and Gang Task Force
11 (WCDGTF) Confidential Source (CS5) purchased heroin from Manuel GARCIA
12 MUNOZ while meeting with GARCIA-MUNOZ in GARCIA MUNOZ’s blue Honda
13 Civic (TV3) in Skagit County. Prior to the controlled buy, investigators searched CS5
14 and CS5’s vehicle for contraband and none was found. CS5 was provided a concealed
15 recording device and pre-recorded buy funds. Investigators followed CS5 to the
16 meeting location in Skagit County and CS5 was not observed meeting with any other
17 individuals prior to meeting with GARCIA MUNOZ. After the meeting investigators
18 followed CS5 to a pre-determined location, where investigators where CS5 gave
19 investigators approximately 56.60 gross grams of heroin and the recording device.

20 56. Agents conducted surveillance after the controlled meeting in Skagit
21 County between CS5 and GARCIA MUNOZ, following TV3. Following the sale of
22 heroin to CS5, GARCIA MUNOZ drove TV3 went to two other public parking areas
23 where the vehicle stayed for approximately ten minutes at each location. Agents
24 followed TV3 to a McDonald’s parking lot in Burlington, WA, where a white male
25 adult wearing a red hat, driving a silver BMW sedan, entered TV3’s passenger side for
26 less than one minute. After the white male adult left TV3, and entered his silver BMW,
27 TV3 left the McDonald’s parking lot and agents continued to follow it until it arrived
28 and parked at GARCIA MUNOZ’s residence (**Target Location 3**).

1 October 18, 2022 Surveillance of TV7

2 57. On October 18, 2022, investigators became aware of a new vehicle driven
 3 by MARTINEZ LOPEZ: a 2017 black BMW 440i (TV7). From October 18, 2022 to
 4 present, investigators, using a remote camera system, have observed MARTINEZ-
 5 LOPEZ in the driver's seat of this vehicle more than 10 times. On or about October 20,
 6 2022, Washington DOL indicated that the vehicle registration had changed from an
 7 uninvolved party in Blaine, WA, to Manuel GARCIA MUNOZ. DOL records indicate
 8 that TV7, Washington license plate CEN6820 is registered to MANUEL GARCIA-
 9 MUNOZ at 18111 25th Ave NE, Apt FF105, Marysville, WA, 98271 (**Target Location**
 10 **3**). Throughout this investigation, agents have observed MARTINEZ LOPEZ and
 11 GARCIA MUNOZ drive several different vehicles including the aforementioned
 12 vehicles listed in this affidavit. Investigators believe that MARTINEZ LOPEZ
 13 regularly alters vehicles to avoid detection by law enforcement and frequently changes
 14 vehicles as he does cellular phones. On October 24, 2022, MARTINEZ LOPEZ was
 15 observed entering TV7 at his residence (**Target Location 3**) and driving away.

16 Location Information for MARTINEZ LOPEZ's Vehicles

17 58. As discussed above, investigators have received court authorization on
 18 multiple occasions to track many of MARTINEZ LOPEZ's vehicles. Investigators
 19 have observed MARTINEZ LOPEZ conduct suspected drug transactions in vehicles
 20 which investigators did not have authorization to track and investigators did not have
 21 tracking devices installed on all of MARTINEZ LOPEZ's vehicle during the entire
 22 course of this investigation. While the tracking data for MARTINEZ LOPEZ's vehicle
 23 does not provide a complete account of MARTINEZ LOPEZ's travel, it gives
 24 investigators a sampling of MARTINEZ LOPEZ's travels and drug trafficking
 25 activities.

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59. Between August 1, 2022, and November 15, 2022, MARTINEZ LOPEZ's vehicles that were being tracked were within approximately 200 feet⁵ of **Target Location 3**, 72 out of a possible 107 days or approximately 65% of the possible days.

60. Investigators have observed MARTINEZ LOPEZ's vehicles go to **Target Location 3** before or after investigators have observed MARTINEZ LOPEZ conduct suspected drug transactions, to include on November 1, 2022, with WITTEVEN, described above.

TARGET LOCATION 4:

3374 ROBERTSON ROAD, BELLINGHAM, WASHINGTON

Records Related to Target Location 4

61. According to a search of the Whatcom County Assessor's website, 3374 Robertson Road, Bellingham, Washington (**Target Location 4**) is owned by Marc OREIRO.

62. According to the Washington Department of Licensing, Marc OREIRO has a driver's license with a listed address of 3374 Robertson Road, Bellingham Washington.

63. According to Puget Sound Energy, the customer of record at **Target Location 4** is Sonya Udhe since 2019. Investigators believe that Udhe is OREIRO's paramour.

Surveillance of MARTINEZ LOPEZ in TV6 at OREIRO's Residence (Target Location 4).

64. On September 29, 2022, investigators observed MARTINEZ LOPEZ get into a white Dodge Durango (WA/BUJ0115) (**TV6**). Investigators followed MARTINEZ LOPEZ in **TV6** to a residence in Bellingham where MARTINEZ LOPEZ remained for a short amount of time. Investigators then followed MARTINEZ LOPEZ

⁵ According to Google Maps, the southbound lanes of I-5 are approximately 300 feet Target Location 3.

1 in **TV6** to 3374 Robertson Road, Bellingham, Washington (**Target Location 4**), the
2 known residence of Marc OREIRO, where MARTINEZ LOPEZ remained for
3 approximately 12 minutes.

4 December 2021 Information Provided by CS2 about TL4.

5 65. In December 2021, CS2⁶ provided information about an individual named
6 Marc ORIERO and ORIERO's drug trafficking activities. CS2 stated that in November
7 2021, CS2 saw a Hispanic Male at ORIERO's house. CS2 stated that on the same date,
8 CS2 saw what appeared to be three gallon-sized zippered bags of crystal
9 methamphetamine, three smaller ounce-size bags of cocaine, and several bags of pills.
10 CS2 was shown a DOL photograph of MARTINEZ LOPEZ and a photo of **TV1**. CS2
11 positively identified both MARTINEZ LOPEZ and **TV1** as what CS2 observed at
12 ORIERO's residence in November 2021.

13 66. Investigators reviewed court authorized location information for **TV1**
14 which indicated that **TV1** had visited ORIERO's residence multiple times, to include on
15 the date indicated by CS2.

16 October 6, 2022 Controlled Purchase from Marc ORERIO

17 67. On October 6, 2022, investigators met with CS2. CS2 provided
18 information that ORIERO was involved in the distribution of fentanyl pills, fentanyl
19 powder, cocaine and methamphetamine on tribal lands. CS2 and CS2's vehicle were
20 search for contraband, none was found. CS2 was provided \$500 in pre-recorded buy
21 funds and a concealed recording device. Investigators followed CS2 to OREIRO's
22 residence (**Target Location 4**) where they observed CS2 walk to the back of the
23 residence and interact with an individual. CS2 remained at OREIRO's residence
24 (**Target Location 4**) for approximately 30 minutes before investigators observed CS2
25 depart OREIRO's residence (**Target Location 4**). Investigators followed CS2 to a pre-

27 ⁶ According to NCIC, CS2 has multiple misdemeanor convictions and has felony convictions for burglary and
28 theft. CS2 is cooperating financial consideration. CS2's cooperation began in October 2021 and is ongoing
through the date of this controlled purchase.

1 arranged meeting location where CS2 provided investigators approximately 27.8 gross
 2 grams of pills believed to contain fentanyl and approximately 3.15 grams of suspected
 3 fentanyl powder. Investigators recovered the recording devices from the CS2 and
 4 searched CS2 and CS2's vehicle for contraband and none was found.

5 68. CS2 told investigators that CS2 met OREIRO in the back patio area and
 6 conducted the transaction in OREIRO's garage. CS2 stated that OREIRO retrieved the
 7 drugs from a shelf in the garage and counted out the drugs in the presence of CS2. CS2
 8 stated that CS2 then provided OREIRO the buy funds.

9 Location Information for MARTINEZ LOPEZ's Vehicles

10 69. Court authorized location information for MARTINEZ LOPEZ's various
 11 vehicles indicates that MARTINEZ LOPEZ's vehicles went to **Target Location 4**⁷
 12 approximately 17 times, specifically on August 17, 24 and 26, 2022, September 4, 10,
 13 14, 22, 23, and 25 2022, October 2, 16, 24, 28 and 29, 2022 and November 4, 6 and 7,
 14 2022.

15
 16 **TARGET LOCATION 5:**

17 **2100 ALABAMA STREET APARTMENT V8, BELLINGHAM, WASHINGTON**

18 Records Related to **Target Location 5**

19 70. According to Puget Sound Energy the customer of record for **Target**
 20 **Location 5** is Amy HAMNER since April 2019.

21 71. According to a search of the Washington Department of Licensing, Amy
 22 HAMNER has registered multiple vehicles at 2100 Alabama Street Apartment V8,
 23 Bellingham, Washington 98229 (**Target Location 5**).

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28 ⁷ Due to positional accuracy errors of GPS and the rural isolated nature of **Target Location 4**, investigators considered MARTINEZ LOPEZ's vehicle at **Target Location 4** if it was within 400 feet of the residence.

1 Messages with 360-919-9666 (TT15)

2 72. According to T-Mobile records, 360-919-9666 (TT15) is subscribed to
3 Kristi Calloway at 3425 Redwood Avenue, Bellingham, Washington 98225 with an
4 activation date of July 15, 2021. According to a toll analysis, MARTINEZ LOPEZ
5 (TT10) has been in contact with 360-919-9666 (TT15) approximately 539 times
6 between June 2, 2022 and August 19, 2022. According to a law enforcement database,
7 TT15 was associated to Amy HAMNER with an address of 2100 Alabama Street
8 Apartment V8, Bellingham, Washington (**Target Location 5**).

9 73. As discussed below, during the court authorized search of Casey
10 LANDIS's cell phone, LANDIS had 360-919-9666 (TT15) saved in his phone as "Amy
11 Hammer." Investigators believe that "Hammer" is a misspelling of HAMNER.

12 74. On July 30, 2022, MARTINEZ LOPEZ (TT10) and 360-919-9666
13 (TT15) exchanged the following messages:

14	7/30/2022 15:57	Incoming	3609199666	"Just passed Angel of the winds"
15				"\0https://www.google.com/url?sa=i&source=web&rct=j&url=https://www.google.com/maps/place//data%3D!4m2!3m1!1s0x548555147adc9731:0x7a64928f7f3cd1b&ved=2ahUKE"
16	7/30/2022 16:43	Outgoing	3609199666	8f7f3cd1b&ved=2ahUKE"
17				"\0https://www.google.com/url?sa=i&source=web&rct=j&url=https://www.google.com/maps/place//data%3D!4m2!3m1!1s0x548555147adc9731:0x7a64928f7f3cd1b&ved=2ahUKE"
18	7/30/2022 16:43	Outgoing	3609199666	8f7f3cd1b&ved=2ahUKE"
19				"\0wjX3d2V5aH5AhUE8ucDHbSnAnIQ4kB6BAgAECI&cd&psig=AOvVaw2OYJ34blm9PvqwtTINA64na&ust=1659310963609000"
20	7/30/2022 16:43	Outgoing	3609199666	
21	7/30/2022 16:43	Outgoing	3609199666	"Hi fitness parking"
22	7/30/2022 16:43	Outgoing	3609199666	"Black lexus front passenger door "
23	7/30/2022 16:43	Outgoing	3609199666	"Leave money and card in the middle "
24	7/30/2022 16:59	Incoming	3609199666	"You locked the door"
25	7/30/2022 17:00	Incoming	3609199666	"My oh my. We r getting gas next door"
26	7/30/2022 17:03	Incoming	3609199666	"Ok we will be right back"
27	7/30/2022 17:07	Incoming	3609199666	"It's not unlocked"

28 75. Based on training and experience I believe that MARTINEZ LOPEZ is
directing the user of 360-919-9666 (TT15) to some money and a card, possibly a

1 payment for a drug debit, in MARTINEZ LOPEZ's vehicle, which he describes as a
2 black Lexus, likely MARTINEZ LOPEZ's black Lexus (TV5).

3 76. On August 1, 2022, MARTINEZ LOPEZ (TT10) and 360-919-9666
4 (TT15) exchanged the following messages:

5	8/1/2022 11:39	Incoming	3609199666	"Waiting..... On you!! Anyway I just got on freeway and I'm halling ass."
6	8/1/2022 11:50	Outgoing	3609199666	"Ok "
7	8/1/2022 11:50	Outgoing	3609199666	"I'm almost done at the dentist "
8	8/1/2022 11:54	Incoming	3609199666	"Ok"
	8/1/2022 11:54	Incoming	3609199666	"Lmk"
9	8/1/2022 12:03	Outgoing	3609199666	"50+180+250+500"
10	8/1/2022 12:04	Incoming	3609199666	"Hi, call me please "
	8/1/2022 12:06	Incoming	3609199666	"I got 8 I'd that ok"
11	8/1/2022 12:07	Incoming	3609199666	"I owe 230 then?"
12				" Gosh I got those little things for a dollar each the other day I couldn't believe it I hope you're getting ready to give me a better deal"
13	8/1/2022 12:07	Incoming	3609199666	
14	8/1/2022 12:11	Outgoing	3609199666	"Lol whattttttttt"
15	8/1/2022 12:12	Outgoing	3609199666	"I need to meet your plug lol"
16	8/1/2022 12:15	Incoming	3609199666	"You already did lol"
	8/1/2022 13:15	Incoming	3609199666	"I'm here"

17 77. Based on my training and experience "50+180+250+500" is reference to
18 the prices for various drugs that were ordered, "I got 8 I'd that ok" is reference to \$800
19 and "I owe 230 then?" is reference to MARTINEZ LOPEZ fronting \$230 worth of
20 drugs to the user of 360-919-9666 (TT15). Additionally, in the contents of this
21 conversation, I believe that "those little things" is reference to "M30" fentanyl pills and
22 that "dollar each" is a reference to paying \$1 per "M30" fentanyl pill. Finally, I believe
23 that "Lol whattttttttt" and "I need to meet your plug lol" is MARTINEZ LOPEZ imply
24 that \$1 per "M30" fentanyl pill was a good price and that MARTINEZ LOPEZ want to
25 meet the user of 360-919-9666 (TT15)'s source of supply.

26 78. On August 12, 2022, MARTINEZ LOPEZ (TT10) and 360-919-9666
27 (TT15) exchanged the following messages:

28	8/12/2022 22:16	Incoming	3609199666	"How long till you get more girl"
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8/12/2022 22:19	Outgoing	3609199666	"I have more it's just in smokey point I only bought 7zips on me"
8/12/2022 23:39	Incoming	3609199666	"Aww ok"
8/12/2022 23:56	Outgoing	3609199666	"Yup u good tho"

79. Based on my training and experience I know that “girl” is commonly used code for cocaine and that “zips” is commonly used code of ounces of drugs. In this conversation, I believe that user of 360-919-9666 (TT15) is asking MARTINEZ LOPEZ for cocaine and MARTINEZ LOPEZ says that he only has seven ounce of cocaine with him but has more cocaine at a location in Smokey Point.

Use of Cell Site Simulator to Location TT15

80. On September 28, 2022, investigators, pursuant to court authorization, utilized a cell site simulator to locate TT15. The cell site simulator indicated that TT15 was likely located within a residence on the west side of the apartment complex at 2100 Alabama Street, in either apartment “V7 or “V8.”

Identification of (360-224-7106) Target Telephone 15a

81. According to T-Mobile records, service ended on September 30, 2022 for 360-919-9666 (TT15). During a toll analysis, investigators identified 360-224-7106 (TT15a) as a new phone number in contact with MARTINEZ LOPEZ’s TT10.

82. According to T-Mobile records, 360-224-7106 (TT15a) is subscribed to Kristi Calloway at 3425 Redwood Avenue, Bellingham Washington 98225 with an activation date of September 30, 2022. As described above, this is the same subscriber information that was listed for 360-919-9666 (TT15). According to a toll analysis, MARTINEZ LOPEZ (TT10) has been in contact with 360-224-7106 (TT15a) approximately 57 times between September 30, 2022 and October 19, 2022.

83. Between September 30, 2022 and October 4, 2022 360-224-7106 (TT15a) contacted 72 different phone numbers. Investigators conducted a common call analysis of 360-919-9666 (TT15) and 360-224-7106 (TT15a), between September 30, 2022 and October 4, 2022, TT15a contacted 58 numbers that were also contacted by TT15. This equates to approximately 80% of the phone numbers called by TT15a were also

1 previously called by TT15. As such, investigators believe that TT15a is used by the
2 same person as TT15 and investigators believe that individual is likely Amy HAMNER.

3 Surveillance of Enoc MARTINEZ LOPEZ on September 28, 2022

4 84. On September 28, 2022, investigators conducted surveillance at
5 HAMNER's suspected residence, 2100 Alabama Street Apartment V8, Bellingham,
6 Washington (**Target Location 5**). Investigators observed MARTINEZ LOPEZ's black
7 Lexus (WA/BSU8484) (**TV5**) park near HAMNER's residence, MARTINEZ LOPEZ
8 get out of the **TV5** and walk into a gate marked V8. Approximately 20 minutes later,
9 investigators observed MARTINEZ LOPEZ walk out of the same gate, return to **TV5**
10 and depart.

11 October 18, 2022 Stop of Darin and Amber COOPER

12 85. On October 18, 2022, investigators conducted surveillance at **Target**
13 **Location 5**. Investigators observed a Nissan Sentra with no rear license plate park near
14 2100 Alabama Street, Bellingham, Washington. Investigators then observed a male,
15 later identified as Darin COOPER, get out of the Nissan Sentra, walk into the gate/door
16 labeled "V8," remain inside for approximately one minute before walking out and back
17 to the Nissan Sentra. Investigators then observed the Nissan Sentra drive away. Based
18 on my training and experience I know that short stay traffic, such as that described
19 above, is consistent with drug trafficking.

20 86. Investigators followed the Nissan Sentra until the vehicle was stopped by
21 a uniformed deputy in a marked patrol car. Deputies identified the driver as Amber
22 Cooper and the passenger as Darin COOPER. Deputies told Amber Cooper and Darin
23 COOPER that they were being detained and not free to leave. While attempting to
24 detain Darin COOPER, Darin COOPER actively resisted and fought with deputies.
25 Deputies subsequently detained Darin COOPER and placed him under arrest for
26 obstructing. During a search incident to arrest of Darin COOPER's person, deputies
27 located a small bag of suspected methamphetamine. Amber Cooper told deputies that
28 she was aware of Darin COOPER's drug use and that she did not know what Darin

1 COOPER did after she dropped him off but would not be surprised if Darin COOPER
2 had just gone to purchase drugs. Darin COOPER was cited and released and Amber
3 Cooper was release from the scene.

4 87. Based on the observations described above, investigators believe that
5 Darin COOPER obtained the methamphetamine from an individual located at **Target**
6 **Location 5**.

7 Stop of Patrick Arnold, Jason ERSKIN and Christina Hawley in November 2022

8 88. On November 9, 2022, investigators conducted surveillance at **Target**
9 **Location 5**. At approximately 7:22 PM, investigators observed Enoc MARTINEZ
10 LOPEZ's white Mercedes (WA/CEX6393) (TV9), park near 2100 Alabama Street,
11 Bellingham, Washington and MARTINEZ LOPEZ walk into the gate/door marked
12 "V8" (**Target Location 5**). At approximately 7:33 PM, investigators observed
13 MARTINEZ LOPEZ walk out of the gate/door marked "V8", walk to the Mercedes
14 (TV9) and drive away.

15 89. Investigators continued to conduct surveillance at **Target Location 5** and
16 at approximately 9:34 PM, investigators observed a female walk into the door/gate
17 marked "V8" (**Target Location 5**). At approximately 9:40 PM, investigators observed
18 the same female walk out of the gate/door marked "V8" and get into a white Ford F250
19 (AZ/8XA1A1A) and drive away. A records check indicated that AZ/8XA1A1A is a
20 2002 Ford F250 registered to Patrick Arnold at 23754 West Hidalgo Avenue, Buckeye,
21 Arizona.

22 90. Investigators followed the Ford F250 until deputies stopped the vehicle.
23 Deputies identified the driver as Patrick Arnold and the passengers as Jason ERSKIN
24 and Christina HAWLEY. Arnold consented to a search of the vehicle and nothing was
25 found. ERSKIN consented to a search of his pockets. Deputies located a small
26 quantity of suspected methamphetamine. ERSKIN then told deputies that he had about
27 an ounce in his other pocket which deputies recovered. ERSKIN then told deputies that
28 he paid \$180 for the methamphetamine and had bought it a few days ago at the casino.

1 HAWLEY told deputies that she went to “Amy’s house” and that she bought
2 methamphetamine for ERSKIN from “Amy” for ERSKIN. ERSKIN confirmed that
3 HAWLEY’s statements were true. As discussed above, investigators believe that Amy
4 HAMNER lives at **Target Location 5** and that the “Amy” referenced by HAWLEY
5 was HAMNER. The methamphetamine seized from ERSKIN weighed 28.1 gross
6 grams and field tested positive for methamphetamine. Arnold, HAWLEY and ERSKIN
7 were released.

8 Location Information for MARTINEZ LOPEZ’s Vehicles

9 91. Court authorized location information for MARTINEZ LOPEZ’s various
10 vehicles indicates that MARTINEZ LOPEZ’s vehicles went to **Target Location 5**⁸
11 approximately 16 times, specifically on July 14, 2022 August 19, 22, 24, and 25, 2022,
12 September 3, 6, 7, 15, 16, 17, 18, 23, and 25 2022 and October 2 and 31, 2022.

13 92. As discussed above, investigators physically observed MARTINEZ
14 LOPEZ at **Target Location 5** on September 28, 2022, which is not a date the tracking
15 information indicated that MARTINEZ LOPEZ was there. The vehicle that
16 MARTINEZ LOPEZ was driving on September 28, 2022, was not being tracked at that
17 time. This illustrates that the tracking information for MARTINEZ LOPEZ’s vehicles
18 does not provide a complete accounting of the instances that MARTINEZ LOPEZ visit
19 a location, the tracking information is an approximation of the number of visits made by
20 MARTINEZ LOPEZ.

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28 ⁸ Due to positional accuracy errors of GPS and urban location, investigators considered MARTINEZ LOPEZ’s vehicle at **Target Location 5** if it was within 150 feet of the residence.

TARGET LOCATION 6:**1511 WILLOWBROOK PLACE, BELLINGHAM, WASHINGTON**Records Related to Target Location 6

93. According to the Whatcom County Assessor's website, 1511 Willowbrook Place, Bellingham, Washington (**Target Location 6**) is owned by Merritt S Washburn. As discussed below, Merritt Washburn is the subscriber for 360-927-5454, the phone believed to be used by Eric WASHBURN.

94. According to Puget Sound Energy, the customer of record for **Target Location 6** is Merritt Washburn, since September 2002.

Messages with 360-927-5454 (TT20)

95. According to Verizon Wireless records, 360-927-5454 (TT20) is registered to Merritt Washburn at 1511 Willowbrook Place, Bellingham, Washington 98229, with a contact name of Erica WASHBURN with activation date of March 21, 2017. According to toll analysis, MARTINEZ LOPEZ (TT10) had been in contact with 360-927-5454 (TT20) approximately 1563 times between May 17, 2022, and October 14, 2022.

96. On June 30, 2022, MARINEZ LOPEZ (TT10) and the user of 360-927-5454 (TT20) exchanged the following messages:

6/30/2022 8:30	Incoming	3609275454	"Can you give me any dirt I know you don't typically get it but it's an emergency.g Hyundai"
6/30/2022 11:39	Outgoing	3609275454	"Dirt?"
6/30/2022 11:39	Outgoing	3609275454	"Ohh I don't have any"
6/30/2022 11:39	Outgoing	3609275454	"I'm all out"
6/30/2022 12:46	Incoming	3609275454	",I know but can you get any dark? I need it to go on vacation "
6/30/2022 12:48	Incoming	3609275454	"Dark tanning lotion that is \n\nI my phone always writes dirt" instead of dark and "house" instead of ha lf ""
6/30/2022 12:49	Incoming	3609275454	"Are you out of the baby powder or dark tanning lotion"
6/30/2022 14:36	Incoming	3609275454	"I'm confused are you out of white or dark?"
6/30/2022 14:43	Outgoing	3609275454	"Dark "
6/30/2022 14:43	Outgoing	3609275454	"Yes none left"

1	6/30/2022 15:19	Incoming	3609275454	"I actually need twice as much "
2				"I'm Going into Safeway to get a phone charger in a few minutes. Then to the North Coast credit Union to get money out of the ATM. My phone is about to die"
3	6/30/2022 15:38	Incoming	3609275454	
4	6/30/2022 15:38	Incoming	3609275454	"Where do you want me to go"
5	6/30/2022 15:45	Incoming	3609275454	"Ok I'm just chilling at safe way "
6	6/30/2022 15:52	Incoming	3609275454	"I gotta get on a flight- any idea how long ?"
7	6/30/2022 16:17	Incoming	3609275454	"Can we. X"

97. Based on training and experience I know that "white" is commonly used code for cocaine and in this investigation may be used as code for white fentanyl powder and that "dark" is commonly used code for heroin. In this conversation, I believe that the user of 360-927-5454 (TT19), likely Erica WASHBURN, as discussed below, asked MARTINEZ LOPEZ if MARTINEZ LOPEZ could obtain heroin for WASHBURN. As discussed below, WASHBURN appears to typically obtain half an ounce of a fentanyl powder from MARTINEZ LOPEZ. As such, investigators believe that this conversation concludes with WASHBURN attempting to meet MARTINEZ LOPEZ to obtain double her typical amount, or a total of one ounce of fentanyl powder.

98. On July 29 and 30, 2022, MARINEZ LOPEZ (TT10) and the user of 360-927-5454 (TT20) exchanged the following messages:

18	7/29/2022 12:36	Outgoing	3609275454	"145 Cascade Pl #105, Burlington, WA 98233"
19	7/29/2022 12:37	Incoming	3609275454	"Ok"
20	7/29/2022 12:55	Incoming	3609275454	"340 Erica o"
21				"\07Ok I have your \$340!\n\nI also have melting popsicles and ice cream in my car I need to get home. \n\nIf it's ok with you., can I send tomorrow?\n\nOf course"
22	7/29/2022 20:52	Incoming	3609275454	
23	7/29/2022 20:52	Incoming	3609275454	"\07 if y need it today, I can come come bsck out to the bank later to deposit "
24	7/29/2022 21:25	Outgoing	3609275454	"Ok I'm in bham rn "
25	7/29/2022 22:57	Incoming	3609275454	"Ok come over soon "
26	7/29/2022 22:57	Incoming	3609275454	"I mean at your liesure lol"
27	7/29/2022 22:58	Outgoing	3609275454	"Ok u just gonna be home"
28	7/29/2022 22:59	Incoming	3609275454	"Yep I can meet u somewhere too if you want "
	7/29/2022 22:59	Incoming	3609275454	"Kids are gone for the weekend"

1	7/29/2022 23:00	Outgoing	3609275454	"Yay!!!! Lol"
2	7/29/2022 23:00	Incoming	3609275454	"lkr!! This never happens"
3	7/30/2022 0:10	Incoming	3609275454	"You coming?"
4	7/30/2022 0:13	Outgoing	3609275454	"In 20 min"
5	7/30/2022 0:13	Outgoing	3609275454	"Leaving custet now"
6	7/30/2022 0:27	Incoming	3609275454	"My\nl\n\nHi"
7	7/30/2022 0:30	Outgoing	3609275454	"Here"

99. Based on training and experience I believe the messages on these days starts with a meeting location. I believe that the message "340 Erica o" is reference to Erica, possible Erica WASHBURN, the listed user of 360-927-5454 (TT20), owes MARTINEZ LOPEZ \$340. The messages also appear to indicate that WASHBURN meets with MARTINEZ LOPEZ to pay her debt

100. Later on July 30, 2022, MARTINEZ LOPEZ (TT10) and the user of 360-927-5454 (TT20) exchanged the following messages:

13	7/30/2022 18:57	Incoming	3609275454	"On my way"
14	7/30/2022 19:04	Outgoing	3609275454	"Ok"
15	7/30/2022 20:11	Incoming	3609275454	"\0/ I'm still on my way"
16				"\0/There's a HUGE pile up traffic jam at college way on the freeway going southbound. I am going to try to take some back roads south. Just letting you know"
17	7/30/2022 20:11	Incoming	3609275454	"\0/There's a HUGE pile up traffic jam at college way on the freeway going southbound. I am going to try to take some back roads south. Just letting you know"
18	7/30/2022 20:11	Incoming	3609275454	"\0/ I'm still on my way"
19	7/30/2022 20:11	Incoming	3609275454	"\01Here's from last night (I only owed u \$340 though lol)\n\n(my husband likes to make sure I'm above and beyond paid off I guess LOL)\n\nHe just now sent you "
20	7/30/2022 21:00	Incoming	3609275454	"\01\$250for 1q , AND I have 250 for the other Q. \n\n(So \$500 total for your last half is that correct?)"
21	7/30/2022 21:00	Incoming	3609275454	

101. Based on training and experience, I believe that "q" is code of a quarter ounce and based on these messages that WASHBURN obtained a half an ounce of fentanyl powder for \$500.

102. On July 31, 2022, MARINEZ LOPEZ (TT10) and the user of 360-927-5454 (TT20) exchanged the following messages:

7/31/2022 15:34	Incoming	3609275454	"This shit is way too strong. Like I literally can split .1 (YES!! POINT ONE) into 3 shots and still get "
7/31/2022 15:34	Incoming	3609275454	"To falling over "

103. Based on training and experience I believe that .1 is reference to .1 grams and using 0.033 grams and the effect of "to falling over" is consistent with using fentanyl powder.

104. On August 2, 2022, MARINEZ LOPEZ (TT10) and the user of 360-927-5454 (TT20) exchanged the following message:

8/2/2022 0:57	Incoming	3609275454	"Hey I just sent you \$420 from my secret cash app (\$husbandofwife) \n\nI have the other \$80 in my pocket. ."
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105. Based on this investigation to date, investigators believe that MARTINEZ LOPEZ uses CashApp to transfer or receive drug proceeds and this messages appears to corroborate that information. Investigators believe that in this message WASHBURN said that she used CashApp to transfer \$420 to MARTINEZ LOPEZ to pay for drugs.

106. On August 12, 2022, MARINEZ LOPEZ (TT10) and the user of 360-927-5454 (TT20) exchanged the following messages:

8/12/2022 19:52	Incoming	3609275454	"Yah can u come here?"
8/12/2022 19:55	Outgoing	3609275454	"Yes send me address"
8/12/2022 19:55	Outgoing	3609275454	"Pls"
8/12/2022 20:01	Incoming	3609275454	"1511 Willowbrook place 98229"

107. In these messages WASHBURN provided "1511 Willowbrook Place 98229" (**Target Location 6**) as her address, which is the same address listed in the subscriber address for TT20.

October 3, 2022 Surveillance of MARTINEZ LOPEZ

108. On October 3, 2022, investigators observed that the location data for MARTINEZ LOPEZ's white BMW (TV4) was in the Bellingham, Washington area. Surveillance was established near WASHBURN's residence at 1511 Willowbrook

Place, Bellingham, Washington. Investigators observed MARTINEZ LOPEZ's white BMW (TV4) drive toward and down the driveway of WASHBURN's residence. MARTINEZ LOPEZ's BMW (TV4) remained in the driveway for a short amount of time before investigators observed it back out of the driveway and drive away.

109. Based on the messages described above, investigators believe that on October 3, 2022, MARTINEZ LOPEZ went to WASHBURN's residence for the purposes of providing WASHBURN drugs.

November 1, 2022 Surveillance of MARTINEZ LOPEZ

110. On November 1, 2022, investigators conducted surveillance of MARTINEZ LOPEZ as he drove his White BMW (TV4). At approximately 9:47 PM, investigators observed the White BMW (TV4) park in a business parking lot in Marysville, Washington next to a Chrysler 300 (CA/8YAZ310). Investigators were then able to observe a male get out of the white BMW, get into the Chrysler 300 and both vehicles depart. According to the California Department of Motor Vehicles, the Chrysler 300 is registered to EAN Holdings LLC (Enterprise, Alamo and National rental cars). According to EAN Holdings records and this vehicle was rented by Merritt Washburn at 1511 Willowbrook Place, Bellingham, Washington (**Target Location 6**).

November 2, 2022 Surveillance of MARTINEZ LOPEZ

111. On November 2, 2022, investigators conducted surveillance at **Target Location 6**. At approximately 10:35 PM, investigators observed MARTINEZ LOPEZ's TV1 park in the area of **Target Location 6**. At approximately 10:39 PM, investigators observed MARTINEZ LOPEZ's TV1 leave **Target Location 6**. Investigators also observed the same Chrysler 300 (CA/8YAZ310), described above, parked in the driveway of **Target Location 6**. Based on training and experience I know that short stay traffic as that described above is consistent with drug trafficking. Based on the observations of investigators and the messages described above, investigators believe that MARTINEZ LOPEZ went to **Target Location 6** to deliver drugs to WASHBURN.

1 Location Information for MARTINEZ LOPEZ's Vehicles

2 112. Court authorized location information for MARTINEZ LOPEZ's various
3 vehicles indicates that MARTINEZ LOPEZ's vehicles went to **Target Location 6**⁹
4 approximately 4 times, specifically on August 12, 2022 and October 3 and 8, 2022 and
5 November 2, 2022.

6 113. Additionally, as is illustrated by the November 1, 2022 meeting and the
7 messages described above, investigators believe that WASHBURN meets with
8 MARTINEZ LOPEZ at locations other than **Target Location 6**.

9
10 **TARGET LOCATION 7:**

11 **4076 JONES LANE, BELLINGHAM, WASHINGTON**

12 Records Related to **Target Location 7**

13 114. According to the Whatcom County Assessor's website, 4076 Jones Lane,
14 Bellingham, Washington is owned by Northwest General Builders Constructions LLC
15 with a mail address of PO Box 2735, Ferndale, Washington.

16 115. According to a search on the Washington Department of Revenue
17 website, N/W General Builders Construction LLC lists a legal name of Aurus
18 Construction LLC and a sole governing individual as Grigoriy N YUDIN with a
19 location and mail address of 3886 Aldergrove Road, Ferndale, Washington.

20 116. According to Puget Sound Energy records the customer of record for
21 **Target Location 7** is Aru us Construction and the listed alternate contact is Grigory
22 YUDIN and Natalya Yudin since October 2022. Investigators believe that "Aru us"
23 Construction is a misspelling of YUDIN's "Aurus" Construction and "Grigory" is a
24 misspelling of "Grigoriy" YUDIN. As discussed above, YUDIN is the owner of Aurus
25 Construction.

26 _____
27 ⁹ Due to positional accuracy errors of GPS, rural location and proximity to other know associated address,
28 investigators considered MARTINEZ LOPEZ's vehicle at **Target Location 7** if it was within 300 feet of the
residence.

1 Messages with 360-325-5738 (TT24)

2 117. According to Verizon Wireless records, no subscriber information is
3 provided for 360-325-5738 (TT24); however, an activation date for January 27, 2021,
4 was listed. According to a toll analysis, MARTINEZ LOPEZ (TT10) has been in
5 contact with 360-325-5738 (TT24) approximately 1076 times between May 16, 2022,
6 and October 17, 2022. Investigators suspected that TT24 is being used by Grigoriy
7 YUDIN.

8 118. In late July/early August 2022, MARTINEZ LOPEZ (TT10) and the user
9 of 360-325-5738 (TT24) exchanged the following messages:

10				"\0Hey bro what's with this white paint, it's different from your normal staff, do you still have your normal staff or can you get it, cause my pps didn't r"
11	7/30/2022 1:44	Incoming	3603255738	
12	7/30/2022 1:44	Incoming	3603255738	"\0eally liked this new one? "
13	7/30/2022 2:01	Outgoing	3603255738	"I havnt had no issue"
14	7/30/2022 2:07	Incoming	3603255738	"Snore it"
15	7/30/2022 2:08	Outgoing	3603255738	"Really "
16	7/30/2022 2:08	Outgoing	3603255738	"What they say"
17	8/1/2022 23:32	Incoming	3603255738	"What up bro, you coming today or tomorrow?"
18	8/2/2022 0:01	Outgoing	3603255738	"Tomorrow I am"
19	8/2/2022 0:01	Outgoing	3603255738	"Yea bro idk what happend on the white"
20	8/2/2022 0:24	Incoming	3603255738	"Oh yea mine take it as is and do they noticed it the difference. You don't have your usual?"
21	8/2/2022 0:28	Incoming	3603255738	"\0If you don't have your usual just bring the same for the amount that was shot. I got your \$100 too. \nOh and if you can remember to bring dark paint one b"
22	8/2/2022 0:28	Incoming	3603255738	"\0ucket tomorrow cause I'm out and of force the little once"
23	8/2/2022 0:28	Incoming	3603255738	"\0ucket tomorrow cause I'm out and of force the little once"
24	8/2/2022 2:00	Incoming	3603255738	"K. What time you thinking?"
25	8/2/2022 2:01	Outgoing	3603255738	"Like 6pm ima leave smokey point "
26	8/2/2022 2:02	Incoming	3603255738	"Lmk before you head this way so I have time to get it ready k"
27	8/2/2022 2:21	Outgoing	3603255738	"Ok"
28	8/2/2022 20:04	Outgoing	3603255738	"On my way"
	8/2/2022 21:23	Incoming	3603255738	"Yo where you at bro?"

8/2/2022 21:47	Incoming	3603255738	"You already here, cause I didn't see your first message right away? "
8/2/2022 22:37	Outgoing	3603255738	"6 min"
8/2/2022 22:38	Incoming	3603255738	"Okay"
8/2/2022 22:43	Outgoing	3603255738	"Cone out"
8/2/2022 22:43	Incoming	3603255738	"K. Give me couple min"

119. Based on the investigation to date, MARTINEZ LOPEZ is not known to be a paint salesman. Based on training and experience I believe that "white paint" is code for cocaine or white fentanyl powder, discussed in other conversations and that "dark paint" is code for heroin. In this conversation investigators believe that the user of 360-325-5738 (TT24) is requesting to obtain heroin and possibly cocaine or white powder fentanyl from MARTINEZ LOPEZ and MARTINEZ LOPEZ agreed to meet them.

120. On August 9 and 10, 2022, MARTINEZ LOPEZ (TT10) and the user of 360-325-5738 (TT24) exchanged the following messages:

8/9/2022 23:31	Incoming	3603255738	"What up bro. You coming tomorrow. I need white paint and I got that cash for ya? "
8/9/2022 23:31	Outgoing	3603255738	"Yes I am "
8/9/2022 23:33	Incoming	3603255738	"K. Lmk b4 heading this way and bring half a bucket of interior white paint. "
8/10/2022 20:34	Outgoing	3603255738	"Yo I'm here"

121. Investigators believe that "bucket" is code for a quantity of drugs, possibly a pound or kilogram quantity. In these messages that investigators believe that the user of 360-325-5738 (TT24) is requested possibly half a pound or kilogram of cocaine or white fentanyl powder.

Use of Cell Site Simulator to locate TT24

122. On September 28, 2022, investigators, pursuant to court authorization, utilized a cell site simulator to locate TT24. The cell site simulator indicated that TT24 was likely in possession of a white adult male in the area of a food truck in Bellingham. Investigators observed this white male walk to a Chevy Silverado (WA/B99947W). According to the Washington Department of Licensing, WA/B99947W is a silver 2009

1 Chevy Silverado registered to Grigoriy YUDIN DBA Reliable Auto at 3886 Aldergrove
2 Road, Ferndale, Washington. Investigators positively identified YUDIN as the white
3 adult male and driver of the Chevy Silverado.

4 November 3, 2022 Surveillance of YUDIN

5 123. On November 3, 2022, investigators conducted surveillance of YUDIN.
6 Investigators established surveillance at YUDIN's residence (**Target Location 7**) at
7 approximately 4:30 PM, at which time, location information for TT24 indicated that it
8 was near **Target Location 7**. At approximately 5:59 PM, investigators observed
9 YUDIN leave Target Location 7 and drive to 3886 Aldergrove Road, Ferndale,
10 Washington. At approximately 10:58 PM, investigators observed YUDIN's vehicle
11 depart the Aldergrove Road address and drive to **Target Location 7**. The location data
12 for TT24 approximately followed the physical observations of YUDIN's location, with
13 TT24 departing **Target Location 7** at approximately the same time as YUDIN, arriving
14 and departing the Aldergrove residence at approximately the same time as YUDIN did
15 and arriving at **Target Location 7** at the same time as YUDIN. Based on the cell site
16 simulator and physical observations of investigators, investigators believe that YUDIN
17 is the user of TT24.

18 Location & Pole Camera Information for MARTINEZ LOPEZ's Vehicles

19 124. Court authorized location information for MARTINEZ LOPEZ's various
20 vehicles indicates that MARTINEZ LOPEZ's vehicles went to **Target Location 7**
21 approximately 11 times, specifically on August 21 and 25, 2022, September 7, 17, and
22 23, 2022, October 10, 24 and 28, 2022, and November 2, 6 and 11, 2022.

23 125. Additionally, investigators have a pole camera installed at **Target**
24 **Location 7**. After conducting a limited review of the pole camera records, investigators
25 observed MARTINEZ LOPEZ's vehicles at **Target Location 7** on the following days
26 September 7, 10, and 24, 2022, October 10, 18, 24 and 31, 2022 and on November 2,
27
28

2022.¹⁰ It should be noted that several of the dates match up to vehicle tracking information and other dates are not listed. As discussed above, investigators did not have tracking devices installed on all of MARTINEZ LOPEZ's vehicles during this entire investigation.

TARGET LOCATION 8:

2100 HALLECK STREET, BELLINGHAM, WASHINGTON

Records Related to Target Location 8

126. **Target Location 8**, sits at the intersection of I Street and Halleck Street in Bellingham, Washington. According to Puget Sound Energy, the address 2100 Halleck Street, Bellingham, Washington does not exist in their records. However, 2100 I Street, Bellingham, Washington has electric service provided by Puget Sound. A search of Whatcom County Assessor's website for 2100 I Street, Bellingham, Washington, does not return any results. As discussed below, GUNDERSON provides 2100 I Street to LANDIS as GUNDERSON's address. An Apple Maps search for 2100 Halleck Street, Bellingham, Washington, gives a location approximately two block northwest of **Target Location 8**. However, an Apple Maps search for 2100 I Street, Bellingham, Washington, gives **Target Location 8**. A Google Maps search for 2100 I Street gives a location in the middle of the intersection of I Street and Halleck Street and a search for 2100 Halleck Street gives **Target Location 8**. Investigators believe that 2100 I Street and 2100 Halleck Street refer to the same location **Target Location 8**, this affidavit will refer to **Target Location 8** by the Whatcom County Assessor's address of 2100 Halleck Street, Bellingham, Washington.

¹⁰ Due to positional accuracy errors of GPS and urban location, investigators considered MARTINEZ LOPEZ's vehicle at **Target Location 7** if it was within 150 feet of the residence.

127. To avoid any confusion, in the sections below I discuss observations of individuals observed walking out of **Target Location 8**, which is depicted in the image below and listed as 2100 Halleck Street, Bellingham, Washington (**Target Location 8**).



128. According to the Puget Sound Energy the customer of record for 2100 I Street, Bellingham Washington is Hanna Erlandson since March 2022. As discussed above, investigators believe that 2100 I Street and 2100 Halleck Street (**Target Location 8**) are the same address.

129. According to a search of the Whatcom County Assessor's website, 2100 Halleck Street, Bellingham, Washington, is the correct address.

Messages with 360-739-0044 (TT30)

130. According to Verizon records, 360-812-5984 (TT30) is subscribed to Terri Gunderson at 5145 Eberly Place, Bellingham, Washington 98226 with an activation date of May 10, 2021. Additionally listed was a contact name of "Anthony Phone." According to toll analysis, MARTINEZ LOPEZ (TT10) had been in contact with 360-739-0044 (TT30) approximately 278 times between May 17, 2022, and October 19, 2022. Investigators know that Anthony GUNDERSON lived at 5145 Eberly Place, Bellingham, Washington 98226.

131. As part of separate but related investigation, Yolanda ORTIGOZA REYES was arrested. Seized from her person at the time of her arrest was approximately 440 gross grams of suspected fentanyl powder, 450 gross grams of suspected fentanyl pills, and 110 grams of suspected heroin and 3 cell phones.

1 ORTIGOZA REYES's phones were searched pursuant to a search warrant. In one of
2 her phones, investigators recovered the following messages:

3	7/22/2022 18:02	Incoming	3607390044	"I want to buy some of the white ones"
4	7/22/2022 18:03	Outgoing	3607390044	"Okay"
5	7/22/2022 18:04	Outgoing	3607390044	"How"
6	7/22/2022 18:13	Outgoing	3607390044	"Send me your location"
7	7/22/2022 18:13	Outgoing	3607390044	"Please"
8	7/22/2022 18:42	Incoming	3607390044	"2100 I Street"
9	7/22/2022 18:44	Outgoing	3607390044	"Ok"
10	7/22/2022 19:23	Outgoing	3607390044	"I'm here"
11	7/22/2022 19:26	Outgoing	3607390044	"I'm here"
12	7/22/2022 19:27	Outgoing	3607390044	"How long"
	7/24/2022 2:50	Incoming	3607390044	"One of the oz you gave me was dark"
	7/24/2022 2:50	Incoming	3607390044	"Not chia"
	7/24/2022 4:25	Outgoing	3607390044	"Omg"
	7/24/2022 4:25	Outgoing	3607390044	"And so sorry"

13 132. Based on my training and experience, I believe that "Chia" is a
14 misspelling of "China," which is commonly used code for fentanyl powder, or possibly
15 white heroin, and "dark" is commonly used code for heroin. In these messages, I
16 believe that GUNDERSON obtained a quantity of obtain fentanyl powder and mixed in
17 with the fentanyl powder was an ounce of heroin instead of fentanyl powder.

18 133. On July 1, 2022, and August 12, 2022, MARINEZ LOPEZ (TT10) and
19 GUNDERSON exchanged the following messages:

20	7/1/2022 10:36	Outgoing	3607390044	"Ay bro can you send the rest of the cash app"
21	8/12/2022 13:19	Outgoing	3607390044	"Let me know when u ready \$1.10"

22 134. Based on my training and experience, I know that "cash app" likely refers
23 to CashApp, an online platform that can be used to send money between people and
24 that \$1.10 is approximately the going wholesale rate for fentanyl pills.

November 2, 2022 Traffic Stop of Kurt HALL

25 135. On November 2, 2022, investigators conducted surveillance on **Target**
26 **Location 8**. At approximately 8:13 PM, investigators observed an individual later
27 identified as Kurt HALL, walk up to the front door of **Target Location 8** and
28 eventually walk inside. At approximately 8:26 PM, investigators observed HALL walk

1 out of **Target Location 8** and walk across the street. A short time later, investigators
2 observed a beige Ford Taurus (WA/BYD2076) driving away from the area. According
3 to the Washington Department of Licensing, WA/BYD2076 is a beige 2002 Ford
4 Taurus registered to Antonya Jo Bill at 2160 Washington Street Apartment 205,
5 Ferndale, Washington. Based on training and experience I know that short stay traffic,
6 such as that described above, is consistent with drug trafficking.

7 136. Investigators followed the vehicle for a short amount of time before
8 uniformed deputies in a marked patrol car stopped the Ford Taurus. Deputies identified
9 HALL as the driver of the vehicle. HALL was detained by deputies. Deputies read
10 HALL his Miranda Rights. Deputies observed a large glass pipe in HALL's pocket,
11 after it was removed, deputies observed that it had apparent drug residue inside it.
12 HALL admitted to having "crack" in his pocket and allowed deputies to retrieve it from
13 his pocket. Based on training and experience, "crack" is commonly used code for a
14 form of cocaine. HALL was also found to have a digital scale in his possession. HALL
15 consented a search of his vehicle and nothing of evidentiary value was found. HALL
16 told deputies that he was at his friend's house and that he bought the pipe from his
17 friend. Shortly thereafter HALL requested to speak to an attorney. After HALL
18 requested to speak to an attorney, he kept rambling and speaking at deputies. HALL
19 was released from the scene.

20 137. Based on the observations described above, investigators suspect that
21 HALL obtained the pipe with drug residue and/or the crack cocaine from an individual
22 at **Target Location 8**.

23 November 2, 2022 Stop of Corbin SAUNDERS; seizure of 4.7 gross grams of
24 methamphetamine, 14.2 gross grams of methamphetamine, 24.9 gross grams of
25 cocaine, an AR15 style rifle and a handgun from his vehicle.

26 138. After the stop of Kurt HALL, discussed earlier in this affidavit,
27 investigators continued surveillance on **Target Location 8**, a suspected location from
28 which controlled substances were being sold by GUNDERSON, a known narcotics
dealer. GUNDERSON's criminal history indicates he has a 2011 felony drug

1 trafficking conviction and a 2019 felony drug trafficking conviction. At approximately
2 9:50 PM, investigators observed an individual, who appeared to be a male adult, walk
3 out of **Target Location 8**, and toward a vehicle later identified as a Tesla. Investigators
4 observed lights activated on the Tesla, and then observed the Tesla drive away and
5 noted the license plate as WA/CEE7989. According to the Washington Department of
6 Licensing, WA/CEE7989 is a blue 2018 Tesla Model 3 registered to Corbin
7 SAUNDERS at 15512 Forty Five Road, Arlington, Washington. Investigators had been
8 conducting hours of surveillance at **Target Location 8** and noted short stay traffic at
9 this residence as described earlier in this affidavit. Based on training and experience I
10 know that short stay traffic, such as that described above, is consistent with drug
11 trafficking. Based on their training and experience, investigators believed that the
12 person driving the Tesla was likely involved in a narcotics transaction with
13 GUNDERSON and/or persons inside of **Target Location 8**.

14 139. Investigators followed the Tesla a short way before it was stopped, within
15 Whatcom County, by uniformed deputies in a marked patrol car. Deputies identified
16 the driver as Corbin SAUNDERS and the passenger as Justy DAVIDSON.
17 SAUNDERS denied consent to search the vehicle. A narcotics detecting K9 alerted to
18 the presence of the odor of narcotics emanating from the vehicle. Deputies seized the
19 vehicle pending the application of a search warrant. SAUNDERS and DAVIDSON
20 were read their Miranda rights. Neither SAUNDERS nor DAVIDSON provided any
21 statements regarding the source of the drugs that would be later found in the vehicle,
22 described below. SAUNDERS and DAVIDSON were released from the scene.
23 According to NCIC, SAUNDERS has multiple prior felony convictions, which would
24 make it illegal for him to possess a firearm.

25 140. On November 3, 2022, a Whatcom County Superior Court Commissioner
26 authorized a search warrant of the Tesla Model 3. On the same day, deputies contacted
27 SAUNDERS and sent him a photograph of the approved search warrant. SAUNDERS
28 remotely unlocked the doors and trunk of the Tesla Model 3. During the search of the

1 vehicle deputies located 4.7 gross grams of suspected methamphetamine from the
2 passenger door and a women's purse which contained 14.2 gross grams of suspected
3 methamphetamine and 24.9 gross grams of suspected cocaine. Also located in the
4 purse was multiple items of dominion and control for DAVIDSON. Located in the
5 center console cup holder was a digital scale with suspected drug residue. Deputies
6 located a purse in the backseat which contained 45.2 gross grams of suspected
7 methamphetamine, 1.4 gross grams of suspected heroin and additional suspected
8 controlled substances.

9 141. During a search of the trunk of the Tesla Model 3, deputies located an
10 AR-15 style rifle (KE Arms, Model KP-15, serial number KM05791). No magazines
11 were found in the trunk of the vehicle. Deputies were initially unable to unlock the
12 glove box of the Tesla Model 3. Deputies contacted SAUNDERS again who eventually
13 gave them the "pin" number to unlock the glove box. Inside the glove box deputies
14 located two rifle magazine which contained ammunition compatible with the rifle found
15 in the trunk and a 9mm handgun (Canik, Model TP9 Elite Combat, serial number
16 BN05248) which was loaded with a round in the chamber and a magazine which
17 contained four more rounds. Neither firearm was listed as stolen. Both SAUNDERS
18 and DAVIDSON are convicted felons are cannot legally possess firearms.

19 142. Based on the observations and seizures discussed above, investigators
20 believe that SAUNDERS and/or DAVIDSON obtained some quantity of drugs from an
21 occupant of **Target Location 8**.

22 Location Information for MARTINEZ LOPEZ's Vehicles

23 143. Court authorized location information for MARTINEZ LOPEZ's various
24 vehicles indicates that MARTINEZ LOPEZ's vehicles went to **Target Location 8**¹¹
25
26

27
28 ¹¹ Due to positional accuracy errors of GPS and urban location, investigators considered MARTINEZ LOPEZ's
vehicle at **Target Location 8** if it was within 150 feet of the residence.

approximately 5 times, specifically on September 18 and 25, 2022, October 14 and 29, 2022, and November 1, 2022.

TARGET LOCATION 9:

1512 IRON STREET, BELLINGHAM, WASHINGTON

Records Related to Target Location 9

144. According to the Puget Sound Energy the customer of record for Target Location 9 is Rick Alcantra since July 2022.

Messages between MARTINEZ LOPEZ and CASEY LANDIS (TT23)

145. According to Verizon Wireless records, no subscriber information is provided for 360-303-3643 (TT23); however, an activation date for April 6, 2021, was listed. According to a toll analysis, MARTINEZ LOPEZ (TT10) has been in contact with 360-303-3643 (TT23) approximately 540 times between June 10, 2022, and October 10, 2022.

146. According to a search of a law enforcement database, 360-303-3643 (TT23) is used by Casey LANDIS. Investigators suspect that this phone is used by Casey LANDIS.

147. On August 2, 2022, MARTINEZ LOPEZ (TT10) and 360-303-3643 (TT23) exchanged the following messages:

8/2/2022 18:43	Incoming	3603033643	"Hey bud, just checking in with you. \nAre you planning on coming to B'ham today/tonight by any chance?"
8/2/2022 18:54	Outgoing	3603033643	"Yea I am what u need "
8/2/2022 18:56	Incoming	3603033643	"Perfect, I'll be at my place. You can swing by whenever you want. \nI'm needing 2 boats. "
8/2/2022 20:39	Outgoing	3603033643	"U home there in 10 min"
8/2/2022 20:43	Incoming	3603033643	"Ten min. \nOk"
8/2/2022 20:43	Outgoing	3603033643	"Cool"
8/2/2022 20:54	Outgoing	3603033643	"Here"
8/2/2022 20:55	Incoming	3603033643	"I'm on the porch. \nCome on up"

148. Based on my training and experience, I know that the term “boat” is common code for a quantity of pills. Specifically, in this investigation, “boat” is common code for 1000 pills or tablets, likely “M30” fentanyl pills. Based on these messages, investigators believe that MARTINEZ LOPEZ met the user of 360-303-3643 (TT23) at their residence in Bellingham Washington to distribute 2000 “M30” fentanyl pills.

149. On August 10, 2022, MARTINEZ LOPEZ and 360-303-3643 (TT23) exchanged the following messages:

8/10/2022 14:23	Incoming	3603033643	"Hey bud, are you coming to B'ham today?"
8/10/2022 14:25	Outgoing	3603033643	" Yes I am like 5pm I should be there"
8/10/2022 14:36	Incoming	3603033643	"Cool, cool!\nI am looking for two boats, and one coke. "
8/10/2022 14:47	Outgoing	3603033643	"Ok"
8/10/2022 17:59	Outgoing	3603033643	"On my way "
8/10/2022 18:04	Incoming	3603033643	"How long till you're here?\nI want to clear out the house "
8/10/2022 18:08	Outgoing	3603033643	"40 min"
8/10/2022 18:08	Outgoing	3603033643	"40 to an hour"
8/10/2022 18:54	Outgoing	3603033643	"What up bro I'm in bham "
8/10/2022 19:13	Incoming	3603033643	"Hey...wanna come over "
8/10/2022 19:19	Outgoing	3603033643	"Yes let me fining lummi first cane here wasn't sure if u were ready "
8/10/2022 19:21	Incoming	3603033643	"Would the silver reef casino be a better place to meet?"
8/10/2022 19:23	Outgoing	3603033643	"U coming here"
8/10/2022 19:23	Outgoing	3603033643	"??"
8/10/2022 19:24	Incoming	3603033643	"I was waiting for you at my house, then was going to go to the casino. \nSo we could either meet there in 30min. Or we could meet at my place "
8/10/2022 19:27	Outgoing	3603033643	"Come to casino then "
8/10/2022 19:28	Incoming	3603033643	"Ok"
8/10/2022 20:19	Outgoing	3603033643	"U at. the casino"
8/10/2022 20:19	Outgoing	3603033643	"I'm 2 min away"
8/10/2022 20:21	Incoming	3603033643	"Fuck bro, my ride is just picking me up. They were late. (Fuckin girls)\nSo just come here if you don't mind"
8/10/2022 20:21	Outgoing	3603033643	"Yup I'm going "
8/10/2022 20:22	Outgoing	3603033643	"No problem on my way"

8/10/2022 20:23	Incoming	3603033643	"Thanks homie. I'm here at the house ready for ya"
8/10/2022 20:29	Outgoing	3603033643	"Ok"
8/10/2022 20:40	Outgoing	3603033643	"Getting off exit"
8/10/2022 20:41	Incoming	3603033643	"Kk"
8/10/2022 20:44	Outgoing	3603033643	"Here"

150. Based on training and experience, I know that "coke" is commonly used terminology for cocaine and, as previously stated above, "boat" is common code for 1000 "M30" fentanyl pills. Based on these messages investigators believe that MARTINEZ LOPEZ met the user of 360-303-3643 (TT23) to provide them with 2000 "M30" fentanyl pills and one quantity of cocaine.

October 11, 2022 Seizure of drugs from Casey LANDIS

151. Investigators obtained and reviewed Silver Reef Casino (Whatcom County) surveillance video of events that occurred on October 11, 2022. In this video, at approximately 8:38 PM, a male, whose appearance matches that of Casey LANDIS, appears to access a fanny pack and remove some money. LANDIS and a female, identified as Dannielle FREDRICKS, then appear to pay for an item at the cash register. At approximately 8:40 PM, LANDIS and the female walk away from the cash register and leave the fanny pack on the counter. Multiple customers walk up to the cash register to purchase items and no one is observed interacting with the fanny pack.

152. At approximately 9:03 PM, an individual is observed mentioning the fanny pack to a casino employee who takes possession of the fanny pack. The fanny pack is placed on the cashier's side of the counter before another casino employee takes custody of the fanny pack. Silver Reef Casino security conducted a routine lost and found inventory of the fanny pack and located suspected controlled substances. The controlled substances in the fanny pack were seized by Lummi Police Department.

153. A Lummi Police Department officer responded to the casino and located the female and male depicted in the video. The officers detained LANDIS and read LANDIS his Miranda Rights. When asked for identification, LANDIS provided an identification for another individual. LANDIS was subsequently taken into custody for

1 criminal impersonation. LANDIS subsequently provided his name and date of birth,
2 officers confirmed LANDIS's identity based on that information.

3 154. During a search of LANDIS's person, officers located a small plastic
4 baggie containing approximately 20 "M30" pills, consistent with fentanyl pills
5 frequently seized in Whatcom County. A cell phone was also seized from LANDIS.

6 155. The fanny pack was determined to contain approximately 541 gross
7 grams of suspected fentanyl pills 332.65 gross grams of suspected methamphetamine
8 and 44.4 gross grams of suspected fentanyl powder. The suspected methamphetamine
9 and suspected fentanyl both presumptively tested positive, using a non-contact
10 handheld drug detection device, for the presence of methamphetamine and fentanyl,
11 respectively.

12 Search of LANDIS's phone

13 156. On October 31, 2022, US Magistrate Judge Brian Tsuchida signed a
14 search warrant authorizing the search LANDIS's cell phone.

15 157. Investigators identified that the phone was assigned phone number 360-
16 303-3643 (TT23). Investigators located numerous messages related to LANDIS's
17 residence and drug trafficking, some of those messages are discussed below.

18 158. On February 25, 2022, LANDIS exchanged the following messages with
19 360-220-2229, saved in his phone as "Mom."

			We can meet up for lunch, that would be nice! Dad and I were going to take off around 1:00 tomorrow so can I pick you up around 11:30? We'll have time to talk and eat! Let me know if that works for you and where I should pick you up!!! Love you ♡
3602202229	Mom	Incoming	Does that work for you???
			Perfect!! 1512 iron street (off lakeway)
3602202229	Mom	Outgoing	See you then Love you

3602202229	Mom	Incoming	I'll see you tomorrow then!!! Looking forward to seeing you! Love you♡
3602202229	Mom	Incoming	Do you want me to bring you some socks, underwear, shirts etc.???

159. In these messages, LANDIS provides 1512 Iron Street (**Target Location 9**) to an individual, who is presumably his mother, as his address in February 2022.

160. On March 8, 2022, LANDIS exchanged the following messages with 360-594-9268, saved in his phone as "Chris Hansen."

3605949268	Chris Hansen	Outgoing	1512 iron st
3605949268	Chris Hansen	Outgoing	Go to the back door
3605949268	Chris Hansen	Incoming	Okay

161. In these messages, LANDIS again provides "1512 iron st" (**Target Location 9**) as his address.

162. On March 8, 2022, LANDIS exchanged the following messages with 360-499-5424, saved in his phone as "Kody."

3604995424	Kody	Incoming	Hit me up we have the money destiny owes you and shit
3604995424	Kody	Outgoing	Right on.sorry phone was dead. I'm around
3604995424	Kody	Incoming	Where you at?
3604995424	Kody	Outgoing	1512 Iron street
3604995424	Kody	Outgoing	One block east (towards the freeway from Nelson's Market) and one block north (towards king street McDonald's) Hit me up when you get to the stop sign at Iron and Gladstone
3604995424	Kody	Incoming	Ok
3604995424	Kody		MESSAGES SKIPPED FOR BREVITY
3604995424	Kody	Incoming	Do you want me to stay here or keep walking towards where you're at?
3604995424	Kody	Outgoing	Ok...coming out How much money do you have
3604995424	Kody	Incoming	I'll give you \$150 total so we owe you \$42 and then \$108 for you know
3604995424	Kody	Outgoing	Ok...word. Just bagging it up. In two minutes, go ahead and walk east one block to where the road ends.

1	3604995424	Kody	Incoming	K
2	3604995424	Kody	Incoming	Hey sorry can I just buy another \$100 worth while I'm here sorry bro
3	3604995424	Kody	Outgoing	Right now??
4	3604995424	Kody	Incoming	I already know I'll have to come back after I give destiny some and Dave and shit
5	3604995424	Kody	Incoming	If you can. Or I can come back later
6	3604995424	Kody	Outgoing	Sure...I'll be right back

163. In these messages, LANDIS provides “1512 Iron Street” (**Target Location 9**) as his address. Additionally, LANDIS and “Kody” discuss money that is owed to LANDIS. Based on training and experience I believe in these messages that when “Kody” said “Hey sorry can I just buy another \$100 worthwhile I'm here sorry bro” they were referring to obtaining an additional quantity of drugs.

164. On March 10, 2022, LANDIS exchanged the following messages with 360-276-6562, saved in his phone as “Black Rob.”

14				Unfortunately no...#1 I'm just a guest at this place, but more importantly, me and my girl are going to be busy for a little while (if you know what I mean)
15	3602766562	Black Rob	Outgoing	
16	3602766562	Black Rob	Incoming	allgood is 1230 cool? what's up the job
17				So come to 1512 iron street, and knock on the front door.
18	3602766562	Black Rob	Outgoing	1230 cool

165. In these messages Landis provided “1512 iron street” (**Target Location 9**) as his address. LANDIS also said, “I’m just a guest at this place.” However, as discussed below, LANDIS continued to provide this as his address into September 2022.

166. On March 13 and 14, 2022, LANDIS exchanged the following messages with 360-770-9942, saved in his phone as “Tommy.”

25	3607709942	Tommy	Incoming	Will you give me that deal for a half roll?? Fifty at 225?
26	3607709942	Tommy	Outgoing	Yeah I can do that
27				MESSAGES SKIPPED FOR BREVITY
28	3607709942	Tommy	Outgoing	Come on through
	3607709942	Tommy	Incoming	Come through where?

3607709942	Tommy	Outgoing	Off lakeway. 1512 iron street
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167. Based on training and experience I know that “roll” is commonly used code for one hundred pills and a “half roll” would be 50 pills. LANDIS also provide “1512 iron street” (**Target Location 9**) as a location to meet.

168. On June 10, 2022, LANDIS exchanged the following messages with 360-739-0044 (TT30), saved in his phone as “Anthony.” As discussed above, investigators believe that 360-739-0044 is used by Anthony GUNDERSON and that GUNDERSON is a redistributor for MARTINEZ LOPEZ.

			It's not like that homie...and we've been nothing but straight up cool to you. We've paid for everything, repaid front, didn't get phone number to one of your connections cuz you asked us not to, brought you your backpack without taking a thing from it, turned down the money kick down you tried giving us, etc. As for helping us get our money up, we both helped each other to get our money up, and any help we've received from you we've been so appreciative for. This is the difficult part of doing business with someone who you like and also consider a friend. But believe me, there was no intended disrespect. Why don't you come over here and talk with us. We just got our own room two days ago.
3607390044	Anthony	Outgoing	
3607390044	Anthony	Incoming	K where at?
			MESSAGES SKIPPED FOR BREVITY
			It's the iron street house that you've been to before. Remember the place where you parked in back and then came downstairs to a tiny disgusting room? Yeah that place. But now we have our own room upstairs that's much much better!
3607390044	Anthony	Outgoing	
3607390044	Anthony	Outgoing	1512 iron street

169. In these messages, LANDIS provides GUNDERSON with “1512 iron street” (**Target Location 9**) as LANDIS’s address.

170. On July 24, 2022, LANDIS and GUNDERSON exchanged the following messages.

3607390044	Anthony	Outgoing	I wanna buy some powder from you. Can you facilitate that?
3607390044	Anthony	Incoming	Which kind
3607390044	Anthony	Outgoing	Honestly I like both
3607390044	Anthony	Outgoing	I've had good purp and I've had good gray. I usually like purple. I would like a b for sure if you can do that. Thanks bud. Let me know
3607390044	Anthony	Incoming	Okay
3607390044	Anthony	Incoming	I got either one

171. Based on training and experience, I believe that “powder” is code for fentanyl powder and “purple” is code for purple colored fentanyl powder, like that investigators seized from WISNIEWSKI, as discussed above.

172. On October 10, 2022, LANDIS and GUNDERSON exchanged the following messages.

3607390044	Anthony	Outgoing	We parked a couple of blocks away and are going to walk there now. Is that ok?
3607390044	Anthony	Outgoing	We're here down the road. What do you want us to do
3607390044	Anthony	Outgoing	Fuck pls hit us up cause we don't have shit.
3607390044	Anthony	Incoming	2100 I street
3607390044	Anthony	Incoming	Just come knock
3607390044	Anthony	Incoming	Why did you guys not just come here ?

173. In these messages, GUNDERSON provides “2100 I street,” as discussed above, based on online mapping software “2100 I street” and 2100 Halleck Street (**Target Location 8**) are interchangeable to get to GUNDERSON’s **Target Location 8**.

174. On July 24, 2022, LANDIS exchanged the following messages with 360-577-7977, saved in his phone as “Tyson (erin's friend).”

1				I wanted to buy a g or two of the fatty powder, and I also have some business ventures I would like to discuss with you
2	3605777977	Tyson (erin's friend)	Outgoing	
3				MESSAGES SKIPPED FOR BREVITY
4	3605777977	Tyson (erin's friend)	Outgoing	Yes that's ok but I live off lakeway now
5	3605777977	Tyson (erin's friend)	Incoming	Oh u didn't say that bro wth. So where do I go
6				Sorry, You never said you were coming. Get on freeway going north. Get off on the lakeway exit
7	3605777977	Tyson (erin's friend)	Outgoing	
8				Go straight at the stop sign after you exit. Then take next left onto Lincoln. Follow the road underneath the overpass until a 4-way stop. Go straight. Take left onto iron street. I live like 3 blocks up on iron street.
9				1215 iron street. I'll be outside when you get here to make it easier.
10				Btw...I'll toss a little gas money in as an apology for wasting your gas.
11	3605777977	Tyson (erin's friend)	Outgoing	
12	3605777977	Tyson (erin's friend)	Incoming	Ok where do I park bro
13	3605777977	Tyson (erin's friend)	Outgoing	I'm sitting in the front yard, you can park in front of me, behind a gold van
14	3605777977	Tyson (erin's friend)	Outgoing	Shit...it's 1512 Iron street

17 175. Based on training and experience I know that “fetty powder” is
18 commonly used code for fentanyl powder and I believe that in these messages LANDIS
19 is attempting to purchase fentanyl powder from “Tyson.” Additionally, LANDIS
20 provided “1512 Iron street” (**Target Location 9**) as his address to meet to obtain the
21 fentanyl powder.

22 176. On July 25, 2022, LANDIS exchanged the following messages with 360-
23 224-6942, saved in his phone as “Brandon.”

24				K, what's your address? I have all of that for you. Do you ever deal with Cashapp or PayPal, etc.?
25	3602246942	Brandon	Incoming	

1			Thanks homie!!
2			My address is: 1512 iron street B'ham Wa
3			98225
4			Come on over whenever you want to
5	3602246942	Brandon	meet. I can also meet you at lakeway Fred Meyers if it's easier

6 177. On September 7, 2022, LANDIS sent the following messages to
7 “Brandon.”

8	3602246942	Brandon	Incoming	What's your address?
9	3602246942	Brandon	Outgoing	1512 iron street

10 178. In both the messages on July 25, 2022, and September 7, 2022, LANDIS
11 provided “1512 iron street” (**Target Location 9**) as his address.

12 179. On September 14, 2022, LANDIS sent the following message to
13 “Brandon”

14			I'll hit you back in a few minutes.
15			I just met victor, and I brought your name
16	3602246942	Brandon	up. He's ok with working with you directly if you want to.

17 180. In these messages, LANDIS discussed meeting with “Victor.” As
18 discussed above, investigators know that MARTINEZ LOPEZ uses the name “Victor”
19 with his drug trafficking associates.

20 181. On July 26, 2022, LANDIS exchanged the following messages with 360-
21 820-5415, saved in his phone as “Kate.”

22	3608205415	Kate	Incoming	What's ur guy's address?
23				MESSAGES SKIPPED FOR BREVITY
24	3608205415	Kate	Outgoing	We're walking home Meet there 1512 iron street

25 182. Here, LANDIS again provides “1512 iron street” (**Target Location 9**) as
26 his address.

27 183. On July 28, 2022, LANDIS exchanged the following messages with 360-
28 919-9666 (TT15), saved in his phone as “Amy Hammer”. As discussed above,

investigators believe that 360-919-9666 is used by Amy HAMNER, the resident of **Target Location 5**, and a suspected drug redistributor for MARTINEZ LOPEZ.

3609199666	Amy Hammer	Incoming	How are you? Where you staying now? I need to see you
3609199666	Amy Hammer	Incoming	??
			I'm at same place for one more week.
3609199666	Amy Hammer	Outgoing	I'm good Victor is on his way to meet me rn
3609199666	Amy Hammer	Incoming	Ok cool. I might just actually get them from him then cuz I need to see him as well. Thanks budd

184. As discussed above, investigators believe that “Victor” is the name used by MARTINEZ LOPEZ with his drug trafficking associates. In these messages HAMNER appears to confirm that she is an associate of MARTINEZ LOPEZ as well as LANDIS. Additionally, LANDIS said that “I’m at the same place for one more week.” However, as discussed above, as recently as September 7, 2022, LANDIS provided **Target Location 9** as his address to others.

185. As shown in the numerous messages described above, LANDIS frequently and consistently has provided **Target Location 9** as his address, even providing it to his mother in February 2022 and most recently in September 2022. Based on these messages, investigators believe that LANDIS resides at **Target Location 9**.

186. On October 10 and 11, 2022, LANDIS exchanged the following messages with 360-982-8719 (TT10), saved in LANDIS’s phone as “Victor.” As discussed above, investigators believe that MARTINEZ LOPEZ uses the name “Victor” with his drug trafficking associates. Additionally, as discussed above, investigators believe that MARTINEZ LOPEZ is the user of TT10.

3609828719	Victor	Outgoing	Hey bud... I know it's a little bit later than normal, but do you happen to be in B'ham by any chance??
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1				I picked those two things up from you yesterday, but Supposedly there's a guy coming to meet me who wants to buy them both. That would mean I would need to hook up with you afterwards.
2				I'm trying to find out exactly when he's going to be here. Then I'll know what I need to do with you. How much longer do you plan on being in B'ham??
3	3609828719	Victor	Outgoing	
4	3609828719	Victor	Incoming	Yea I am what's up
5	3609828719	Victor	Incoming	Probably like 1130
6	3609828719	Victor	Incoming	Then I'm leaving
7	3609828719	Victor	Outgoing	Perfect. Before you leave would you HMU?
8	3609828719	Victor	Incoming	Yup
9	3609828719	Victor	Outgoing	thanks bro
10				Worst case I'll just drop it off before u leave so u not empty and pay me tomorrow if that guy still hasn't showed up
11	3609828719	Victor	Incoming	
12	3609828719	Victor	Incoming	I know ppl say a time then they slack for a bit
13				Yeah! Cool bro.
14				Not a problem.
15				That would be a good help.
16	3609828719	Victor	Outgoing	Talk to you soon
17	3609828719	Victor	Incoming	M
18	3609828719	Victor	Incoming	Ok
19				No Sooo...I'm going to be needing to see you ASAP. Need clear and powder mostly. That meeting I told you about just took place and it was a robbery.
20				They got a lot of stuff. Like \$2000, 20g powder, two pistols, 2 oz clear, 40g of gold, and a shit-ton of gift cards.
21				On a positive note...I saved all three boats, and I still have \$12000.
22				So I'm going to be fine. But definitely need more of the powder ASAP. Clear too.
23				Oh yeah... I chased after them, and I slipped in the dog shit. FUCK MY LIFE
24	3609828719	Victor	Outgoing	
25	3609828719	Victor	Incoming	Yes I am

1			Perfect!!
2	3609828719	Victor	You have any idea of an ETA? We believe it was Gary Artima
3	3609828719	Victor	Incoming Who robbed u
4			Hey bro...are you coming to B'ham today? Let me know. I'm going to pick up money right now
5	3609828719	Victor	Outgoing Hey bud...are you here yet?
6	3609828719	Victor	Incoming Yes
7	3609828719	Victor	Incoming I'm in town
8			Sweet! Wanna meet me at my place? (I paid a blue to have the shit cleaned off the sidewalk!)
9	3609828719	Victor	Outgoing I'll be there at 10
10	3609828719	Victor	Incoming Lol ok
11	3609828719	Victor	Outgoing
12	3609828719	Victor	Incoming Going to u now
13	3609828719	Victor	Outgoing Cool I'm there and the doors open for ya
14	3609828719	Victor	Incoming K

187. Based on training and experience, I know that powder, is commonly used code for fentanyl powder, clear is commonly used code for methamphetamine, blue is commonly used code for fentanyl pill and boats is commonly used code for 1,000 pills, in this case likely fentanyl pills. When LANDIS said “I saved all three boats,” I believe that LANDIS told MARTINEZ LOPEZ that he still had 3,000 fentanyl pills. When LANDIS said “Need clear and powder mostly” I believe that LANDIS was requesting methamphetamine and fentanyl powder from MARTINEZ LOPEZ. As discussed above, on October 11, 2022, Lummi Police Department recovered approximately 2499 suspected fentanyl pills, 183.3 gross grams of suspected methamphetamine and 19.7 gross grams of suspected fentanyl from a fanny pack abandoned by LANDIS. These drug quantities are consistent with the quantities and drug types discussed with MARTINEZ LOPEZ in the messages above.

188. Investigators located a video with a created date of September 21, 2022, that shows multi-color pills and blue pills, both which are consistent in appearance to

1 fentanyl pills seized by investigators in this and other investigations. This video had a
2 recorded coordinates of 48.7497, -122.4663. According to Google Maps, these
3 coordinate are approximately at **Target Location 9**. Investigators also observed
4 multiple photographs of firearms with location information at or near **Target Location**
5 **9**. According to NCIC, LANDIS has prior felony convictions which would make him
6 ineligible to possess a firearm.

7 Location information for LANDIS's TT23

8 189. As discussed above, in September and October 2022, investigators
9 obtained court authorization to obtain location information for LANDIS's TT23. As
10 discussed above, TT23 was the phone number assigned to the phone seized from
11 LANDIS.

12 190. Investigators received location information for LANDIS TT23 between
13 September 12, 2022, and October 16, 2022, and started to receive data again on
14 November 2, 2022. Investigators reviewed this information through November 15,
15 2022. Location information for LANDIS's TT23 has not been particularly accurate
16 with positional accuracy usually over 1000 meters and sometimes between 300 and
17 1000 meters. While the location information is not precise enough to pinpoint
18 LANDIS's whereabouts and investigators conducted an analysis of the location data,
19 described below.

20 191. Between November 2 and November 15, 2022, location information
21 indicated that TT23 was within approximately a half a mile of **Target Location 9**
22 during the overnight hours on every night except for three nights or approximately 79%
23 of the nights.

24 192. Between September 12, 2022 and October 16, 2022, location information
25 indicated that TT23 was within approximately a half a mile of **Target Location 9**
26 during the overnight hours one every night except for nine nights, or approximately
27 75% of the nights.

193. Based on the messages and location information discussed above, investigators believe that LANDIS lives at **Target Location 9** and that there is probable cause to believe that evidence of LANDIS and MARTINEZ LOPEZ's drug trafficking activities will be found at **Target Location 9**.

Surveillance of Target Location 9

194. In November 2022, investigators conducted surveillance at **Target Location 9**. Investigators observed FREDRICKS walk out of **Target Location 9** smoke a cigarette before walking toward the rear of the residence. As discussed above, investigators observed video of FREDRICKS with LANDIS at the Silver Reef Casino on October 11, 2022, when the drugs were seized from a bag, abandoned by LANDIS at a casino counter. Based on messages reviewed by LANDIS, investigators believe FREDRICKS be LANDIS's paramour and to live with LANDIS at **Target Location 9**.

Location Information for MARTINEZ LOPEZ's Vehicles

195. Court authorized location information for MARTINEZ LOPEZ's various vehicles indicates that MARTINEZ LOPEZ's vehicles went to **Target Location 9**¹² approximately 14 times, specifically on September 3, 13, 14, 21 and 25, 2022, October 8, 9, 12, 21, 24, 28 and 29, 2022, and November 5 and 7, 2022.

SUPPLEMENTAL INFORMATION ON TARGET VEHICLES

Target Vehicle 1 (TV1): Toyota Tacoma (WA/C88437V)

Target Vehicle 4 (TV4): white BMW 540 (WA/CCV6269)

Target Vehicle 5 (TV5): black Lexus IS (WA/BSU8484)

Target Vehicle 6 (TV6): white Dodge Durango (WA/BUJ0115)

Target Vehicle 7 (TV7): black BMW 440i sedan (WA/CEN6820)

Target Vehicle 9 (TV9): Mercedes Sedan (WA/CEX6393)

¹² Due to positional accuracy errors of GPS and urban location, investigators considered MARTINEZ LOPEZ's vehicle at **Target Location 9** if it was within 300 feet of the residence.

1 196. According to the Washington State Department of Licensing (“DOL”),
2 **Target Vehicle 1** is registered to ANJELICA J LOPEZ VILLESICA, at 1628 North
3 26th Street, Apartment 205 in Mount Vernon, Washington.

4 197. According to the DOL **Target Vehicle 4** is registered to ANJELICA J
5 LOPEZ VILLESICA at 6225 84th PL NE, Marysville, Washington.

6 198. According to the DOL **Target Vehicle 5** is registered to ENOC
7 MARTINEZ-LOPEZ at 1610 N 26th St, Apt 101, Mount Vernon, Washington.

8 199. According to the DOL **Target Vehicle 6** is registered to Anjelica J
9 LOPEZ VILLESICA at 1628 North 26th Street Apartment 205, Mount Vernon,
10 Washington 98273.

11 200. According to the DOL **Target Vehicle 7** is registered to Manuel
12 GARCIA-MUNOZ at 18111 25th Ave NE, Apt FF105, Marysville, Washington 98271.

13 201. According to the DOL **Target Vehicle 9** is registered to Dmytro Volodko
14 at 184th Street Southwest Unit A409, Lynnwood, Washington 98037.

15 202. As discussed throughout this affidavit, investigators have observed
16 MARTINEZ LOPEZ driving or riding as a passenger in numerous vehicles throughout
17 the course of this investigation, many of these instances were described in the
18 paragraphs above.

19 203. MARTINEZ LOPEZ, driving **TV1**, was observed meeting with
20 WISNIEWSKI on April 18, 2022, when fentanyl pills and other objects were seized
21 from WISNIEWSKI. Additionally, MARTINEZ LOPEZ was observed driving to
22 **Target Location 6** in October 2022 in **TV1**.

23 204. MARTINEZ LOPEZ was observed driving **TV4** on November 1, 2022,
24 when investigators believe that MARTINEZ LOPEZ met with WITTEVEEN and
25 investigators seized approximately 959 gross grams of methamphetamine and
26 approximately 346 gross grams of suspected fentanyl pills discarded by WITTEVEEN.
27 Investigators also observed MARTINEZ LOPEZ drive **TV4** to various target locations.
28

1 205. MARTINEZ LOPEZ was observed driving **TV5** during the August 31,
2 2022, controlled purchase where investigators, utilizing a confidential source,
3 purchased approximately 197 gross grams of suspected fentanyl pills and 55 gross
4 grams of suspected heroin from MARTINEZ LOPEZ.

5 206. MARTINEZ LOPEZ was observed driving **TV6** on September 29, 2022,
6 when investigators followed MARTINEZ LOPEZ in **TV6** to OREIRO's residence
7 (**Target Location 4**). Investigators suspect that this was to provide OREIRO drugs or
8 obtain drug proceeds from OREIRO.

9 207. Investigators observed MARTINEZ LOPEZ as the operator of **TV7** on
10 multiple occasions in October 2022. Washington DOL records indicate that **TV7** is
11 registered to GARCIA MUNOZ at **Target Location 3**. Additionally, court authorized
12 location data for **TV7** indicates that **TV7** has been at **Target Location 3** on at least one
13 occasion every day since the day the tracking device was installed, November 1, 2022,
14 through November 15, 2022.

15 208. MARTINEZ LOPEZ was observed driving **TV9** during the November 9,
16 2022, controlled purchase of approximately 170 gross grams of suspected fentanyl pills.

17 209. In summary, investigators have observed MARTINEZ LOPEZ driving or
18 riding in virtually all of the listed **Target Vehicles** while conducting suspected drug
19 activities. Additionally, investigators have not been able to ascertain any pattern to
20 MARTINEZ LOPEZ's use of these vehicles and MARTINEZ LOPEZ appears to use
21 the vehicles interchangeably. Investigators are seeking authorization to search all of
22 MARTINEZ LOPEZ's vehicles for evidence of his drug trafficking activities.

23
24 **KNOWLEDGE BASED ON TRAINING AND EXPERIENCE**

25 210. Based upon my training and experience, and my discussions with other
26 experienced officers and agents experienced in drug and money laundering
27 investigations, I know the following:
28

1 a. During the execution of search warrants, it is common to find
2 papers, letters, billings, documents, and other writings that show ownership, dominion,
3 and control of vehicles, residences, and/or storage units.

4 b. It is common for drug dealers to secrete contraband, proceeds of
5 drug sales, and records of drug transactions in secure locations within their vehicles,
6 residences, and/or storage units for their ready access and to conceal them from law
7 enforcement.

8 c. Narcotics traffickers maintain books, records, receipts, notes,
9 ledgers, airline tickets, money orders, and other papers relating to the transportation,
10 ordering, sale, and distribution of controlled substances. Narcotics traffickers
11 commonly “front,” that is, provide on consignment, controlled substances to their
12 clients. These books, records, receipts, notes, and ledgers, commonly known as “pay
13 and owe sheets,” are maintained where traffickers have ready access to them.

14 d. Traffickers of controlled substances, and those who assist them,
15 maintain and tend to retain accounts or records of their drug trafficking activities,
16 including lists of drug quantities and money owed, telephone records including contact
17 names and numbers, photographs, and similar records of evidentiary value. These
18 items are generally kept in locations where drug traffickers believe their property is
19 secure and will remain undetected from law enforcement, such as inside their homes
20 and vehicles. Sometimes, these locations are not their primary residence, but instead
21 used for the purposes of storing and distributing drugs.

22 e. Traffickers of controlled substances commonly maintain records
23 reflecting names or nicknames, addresses, vehicles, and/or telephone numbers of their
24 suppliers, customers and associates in the trafficking organization. Traffickers
25 commonly maintain this information in books or papers as well as in cellular telephones
26 and other electronic devices. Traffickers often maintain cellular telephones for ready
27 access to their clientele and to maintain their ongoing narcotics business. Traffickers
28 frequently change their cellular telephone numbers to avoid detection by law

1 enforcement, and it is common for traffickers to use more than one cellular telephone at
2 any one time.

3 f. Traffickers maintain evidence of their criminal activity at locations
4 that are convenient to them, including their residences and vehicles. This evidence
5 often includes more than contraband and paraphernalia and includes financial records,
6 records of property and vehicle ownership, records of property rented, records of
7 storage facilities used to hide drugs or currency, and other documentary evidence
8 relating to commission of, and proceeds from, their crimes. Narcotics traffickers
9 sometimes take or cause to be taken photographs and/or video recordings of
10 themselves, their associates, their property, and their illegal product, or have photo or
11 video security systems that record images from their homes or property. These
12 individuals usually maintain these photographs and recordings in their possession or at
13 their premises, in a safe place. Such evidence may be kept at a safe location for a long
14 time after the drug deal(s) to which they pertain are completed, if the location remains
15 under the control of the trafficker.

16 g. Traffickers frequently maintain items necessary for weighing,
17 packaging and cutting drugs for distribution. This paraphernalia often includes, but is
18 not limited to, scales, plastic bags and other packaging materials, sifters, containers, and
19 cutting/diluting agents and items to mask the odor of narcotics. Persons trafficking and
20 using controlled substances frequently sell more than one type of controlled substance
21 at any one time.

22 h. It is common for drug dealers to also be users of their product, and
23 it is common for drug users to maintain paraphernalia associated with the use of
24 controlled substances, such as syringes, pipes, spoons, containers, straws, and razor
25 blades.

26 i. Traffickers frequently maintain records, books, notes, ledgers,
27 travel documents, and other papers relating to the transportation and distribution of
28

1 controlled substances in locations convenient to them, such as their residences and
2 vehicles.

3 j. Traffickers often maintain weapons, including firearms and
4 ammunition, in secure locations such as their residences and vehicles, in order to
5 protect their drugs and drug proceeds.

6 k. Traffickers often have false identification documents and
7 identification documents in the names of others. Traffickers very often place assets in
8 names other than their own, or use fictitious names and identification, to avoid
9 detection of these assets by government agencies, while continuing to use these assets
10 and exercise dominion and control over them.

11 l. Drug trafficking is a cash business, often involving large amounts
12 of cash at any one time, so drug traffickers often have money counters.

13 m. A common method that drug traffickers use to distribute drugs is
14 through the use of passenger vehicles. Similarly, the proceeds of the sales of drugs are
15 sometimes transported back in the same manner. Vehicles used by drug traffickers are
16 often placed in fictitious or nominee names, and outfitted with concealed compartments
17 where the drugs and drug proceeds can be hidden to lessen the likelihood of
18 interdiction.

19 n. Persons involved in drug trafficking conceal in their residences caches of
20 drugs, large amounts of currency, financial instructions, precious metals, jewelry, and
21 other items of value and/or proceeds of drug transactions as well as evidence of
22 financial transactions relating to obtaining, transferring, secreting, or the spending of
23 large sums of money made from engaging in narcotics trafficking activities.

24 o. Unexplained wealth is probative evidence of crimes motivated by
25 greed, in particular, trafficking in controlled substances.

26 p. Illegal drug trafficking is a continuing activity over months and
27 even years. Illegal drug traffickers will repeatedly obtain and distribute controlled
28 substances on a somewhat regular basis, much as any distributor of a legitimate

1 commodity would purchase stock for sale, and, similarly, drug traffickers will have an
2 “inventory,” which fluctuates in size depending upon various factors, including the
3 demand and supply for the product. I would expect the trafficker to keep records of
4 their illegal activities for a period of time extending beyond the time during which they
5 actually possesses illegal controlled substances, in order that they can maintain contact
6 with his criminal associates for future drug transactions, and so that they can have
7 records of prior transactions for which, for example, they might still be owed money, or
8 might owe someone else money. These records are often created in code.

9 q. Drug trafficking is a cash business, and in order to escape notice
10 from authorities for using unexplained income, or hide excessive cash from illegal
11 activities, traffickers either keep large quantities of cash at home or other secure
12 locations, such as safe deposit boxes, or convert the cash into other valuable assets,
13 such as jewelry, precious metals, monetary instruments, or other negotiable forms of
14 wealth. Records of such conversions are often stored where a trafficker lives or in other
15 secure locations such as safe deposit boxes.

16 r. Money launderers often have banking records to include, but not
17 limited to, deposit or withdrawal slips, bank statements, checks, or money orders. These
18 items can be found in residences, vehicles, storage units, cellular phones, digital
19 devices, among other locations. Some of these banking records may not be in their own
20 name. Money launderers often have several accounts documented in some form, or
21 instructions detailing how to handle each respective account. For example, they may
22 have a list of accounts belonging to several different people with instructions for how
23 much to deposit or withdraw from each and often maintain this information for long
24 periods of time in their residences or safe deposit boxes.

25 s. Money launderers often have records or evidence related to how
26 the proceeds were spent or concealed and often maintain this information for long
27 periods of time in their residences or safe deposit boxes. Evidence may include jewelry
28 and/or vehicles, as well as the contents of storage lockers, safe deposit boxes or bank

1 accounts. The use of bank accounts is a common money movement technique used by
2 drug traffickers to receive payment for narcotics from customers outside of their
3 geographic region. It is common for a trafficker to use several bank accounts for this
4 purpose simultaneously in an attempt to avoid detection by the financial institutions
5 and/or law enforcement. The use of multiple accounts, and the commingling of illicit
6 funds with legitimate funds in particular, is often part of the plan to conceal the illegal
7 activity or may be part of the overall integration mechanism by which the illicit funds
8 are made to appear as part of the legitimate income so that only a small portion of or
9 even none of the funds from an account are seized.

10 t. I know from my training and experience that Mexico-based DTOs
11 frequently use various wire-remitter services and multiple senders to transfer money in
12 relatively small increments to multiple recipients. DTOs employ such tactics in an
13 effort to avoid triggering mandatory financial-reporting requirements of the wire-
14 remitter operators and to avoid law enforcement detection. I also know from my
15 training and experience that Mexico-based DTOs often use such wire transfers in order
16 to quickly move a small portion of drug proceeds out of the United States and into the
17 possession of DTO operatives and leadership in Mexico, with the bulk of the cash drug
18 proceeds to follow later.

19 u. Based on my training and experience, I know that international
20 money transfers among DTO members can be made through various digital money
21 transfer services utilizing internet-connected digital devices such as desktop and laptop
22 computers. In addition, those digital devices can be used by DTO members to access,
23 store, send, and receive records related to such international money transfers.
24 Accordingly, internet-connected digital devices owned or used by DTO members could
25 harbor evidence of money laundering.

26 211. Based on my training and experience, and that of other investigators I
27 have talked to, I also know that drug dealers use cellular telephones as a tool or
28 instrumentality in committing their criminal activity, to include laundering their

1 proceeds. They use them to maintain contact with their suppliers, distributors, and
2 customers. They prefer cellular telephones because, first, they can be purchased
3 without the location and personal information that land lines require. Second, they can
4 be easily carried to permit the user maximum flexibility in meeting associates, avoiding
5 police surveillance, and traveling to obtain or distribute drugs. Third, they can be
6 passed between members of a drug conspiracy to allow substitution when one member
7 leaves the area temporarily. Since cellular phone use became widespread, every drug
8 dealer I have contacted has used one or more cellular telephones for his or her drug
9 business. I also know that it is common for drug traffickers to retain in their possession
10 phones that they previously used, but have discontinued actively using, for their drug
11 trafficking business. These items may be kept for months and months in a safe place
12 controlled by the drug trafficker. Based on my training and experience, the data
13 maintained in a cellular telephone used by a drug dealer is evidence of a crime or
14 crimes. This includes the following:

15 a. The assigned number to the cellular telephone (known as the
16 mobile directory number or MDN), and the identifying telephone serial number
17 (Electronic Serial Number, or ESN), (Mobile Identification Number, or MIN),
18 (International Mobile Subscriber Identity, or IMSI), or (International Mobile Equipment
19 Identity, or IMEI) are important evidence because they reveal the service provider,
20 allow us to obtain subscriber information, and uniquely identify the telephone. This
21 information can be used to obtain toll records, to identify contacts by this telephone
22 with other cellular telephones used by co-conspirators, to identify other telephones used
23 by the same subscriber or purchased as part of a package, and to confirm if the
24 telephone was contacted by a cooperating source.

25 b. The stored list of recent received, missed, and sent calls is
26 important evidence. It identifies telephones recently in contact with the telephone user.
27 This is valuable information in a drug investigation because it will identify telephones
28 used by other members of the organization, such as suppliers, distributors and

1 customers, and it confirms the date and time of contacts. If the user is under
2 surveillance, it identifies what number he called during or around the time of a drug
3 transaction or surveilled meeting. Even if a contact involves a telephone user not part
4 of the conspiracy, the information is helpful (and thus is evidence) because it leads to
5 friends and associates of the user who can identify the user, help locate the user, and
6 provide information about the user. Identifying a defendant's law-abiding friends is
7 often just as useful as identifying his drug-trafficking associates.

8 c. Stored text messages are important evidence, similar to stored
9 numbers. Agents can identify both drug associates, and friends of the user who likely
10 have helpful information about the user, his location, and his activities.

11 d. Drug traffickers increasingly use applications on smart phones that
12 encrypt communications such as WhatsApp, or applications that automatically delete
13 messages, such as Snapchat, in order to avoid law enforcement monitoring or recording
14 of communications regarding drug trafficking and/or money laundering. Evidence of
15 the use of such applications can be obtained from smart phones, and is evidence of a
16 smart phone user's efforts to avoid law enforcement detection.

17 e. Photographs on a cellular telephone are evidence because they help
18 identify the user, either through his or her own picture, or through pictures of friends,
19 family, and associates that can identify the user. Pictures also identify associates likely
20 to be members of the drug trafficking organization. Some drug dealers photograph
21 groups of associates, sometimes posing with weapons and showing identifiable gang
22 signs. Also, digital photos often have embedded "geocode" or GPS information
23 embedded in them. Geocode information is typically the longitude and latitude where
24 the photo was taken. Showing where the photo was taken can have evidentiary value.
25 This location information is helpful because, for example, it can show where
26 coconspirators meet, where they travel, and where assets might be located
27
28

1 f. Stored address records are important evidence because they show
2 the user's close associates and family members, and they contain names and nicknames
3 connected to phone numbers that can be used to identify suspects.

4 **CONCLUSION**

5 128. Based on the information set forth herein, there is probable cause to
6 search the above described **Target Locations, Target Vehicles and Target Devices**, as
7 further described in Attachment A, for evidence, fruits and instrumentalities, as further
8 described in Attachment B, of crimes committed by the individuals listed in this
9 affidavit and their coconspirators, specifically distribution of, and possession with
10 intent to distribute, controlled substances, in violation of Title 21, United States Code,
11 Section 841(a)(1); conspiracy to distribute controlled substances, in violation of Title
12 21, United States Code, Sections 841(a)(1) and 846; and/or money laundering and
13 conspiracy to launder money, in violation of Title 18, United States Code Section 1956
14 and 1956(h).

15
16
17 
18 Joseph Cheng
19 Special Agent
20 Drug Enforcement Administration

21 The above-named agent provided a sworn statement attesting to the truth of the
22 contents of the foregoing affidavit on the 28th day of November, 2022.

23
24 
25 MICHELLE L. PETERSON
26 United States Magistrate Judge
27
28

ATTACHMENT A

PROPERTY TO BE SEARCHED

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found.

For physical locations, this includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), and vehicles located within said property or within the residence/location described below.

For vehicles to be searched, this includes all areas of the vehicle, all compartments, and all containers within that vehicle, whether locked or not.

Residences

Target Location 2 (TL2): 6225 84th Place Northeast, Marysville, Washington.

Target Location 2 is a single floor single family residence. The numbers 6225 are affixed vertically to a post near the front door. The red front door faces west into the cul-de-sac. The house is light blue and cream colored with white trim.



1 **Target Location 3 (TL3): 18111 25th Avenue Northeast, Apartment FF105,**
2 **Marysville, Washington.**

3 **Target Location 3** is a two story middle unit in a multi-residence townhome
4 building. Target Location 4 has tan siding with white and gray trim. The garage door
5 is mixed white and gray in color and faces east toward Gregory Landing Lane.
6 “FF105” is affixed to the building next to the garage door. The front door faces south.
7



1 **Target Location 4 (TL4): 3374 Robertson Road, Bellingham, Washington.**

2 **Target Location 4** is on the east side of Robertson Road and is a two story
3 single family residence. The residence is blue/gray in color with white trim. The
4 numbers 3374 are affixed above the garage doors. A double and single garage door and
5 a mostly glass front door face Robertson Road.



Target Location 5 (TL5): 2100 Alabama Street Apartment V8, Bellingham, Washington.

Target Location 5 is an apartment complex named the Crimson Hills Townhomes at the intersection of Alabama Street and Woburn Street. Apartment V8 is two stories and faces west toward Valencia Street. V8 is affixed to a post next to a wooden gate across the entry to the residence.



1 **Target Location 6 (TL6): 1511 Willowbrook Place, Bellingham, Washington.**

2 **Target Location 6** is a single family residence at the end of Willowbrook Place.
3 The black numbers 1511 are affixed to a white board next to the front door. The house
4 is tan in color with white trim. The red front door and white garage door both face east
5 toward Willowbrook Place.



1 **Target Location 7 (TL7): 4076 Jones Lane, Bellingham, Washington**

2 **Target Location 7** is a two story single-family residence that is dark in color
3 with light colored trim. **Target Location 7** is at the end of a long driveway off of Jones
4 Lane. A dark color garage door and dark colored front door with glass panes face Jones
5 Lane to the west. A small outbuilding sits at the end of the driveway nearest to Jones
6 Lane.



1 **Target Location 8 (TL8): 2100 Halleck Street, Bellingham, Washington**

2 **Target Location 8** is a single family single floor residence, cream in color with
3 a brown roof and is located on the east side of the intersection of I Street and Halleck
4 Street. The number 2100 are affixed next to the front door of the residence that faces
5 Halleck Street. The front door is brown in color.



Target Location 9 (TL9): 1512 Iron Street, Bellingham, Washington.

Target Location 9 is a one-story single family residence located on the east side of Iron Street. The house is gray/blue in color with white trim and a white with glass panels front door facing west. The number 1512 are affixed to the residence next to the front door.



For this location, search is only authorized for areas that CASEY LANDIS has direct access, including his personal room or rooms and any common areas (including bathrooms, kitchen, and living areas) to which he has access. Search is not authorized for rooms that CASEY LANDIS does not have direct access (including bedrooms associated with other individuals).

Vehicles

Target Vehicle 1 (TV1): a 2019 Toyota Tacoma bearing Washington license plate C88437V (hereinafter, “**Target Vehicle 1**”). According to the Washington State Department of Licensing (“DOL”), **Target Vehicle 1** is registered to ANJELICA J LOPEZ VILLESICA, at 1628 North 26th Street, Apartment 205 in Mount Vernon, Washington.

Target Vehicle 4 (TV4): a 2017 white BMW 540 sedan bearing Washington license plate CCV6269 (hereinafter, “**Target Vehicle 4**”). According to the DOL **Target Vehicle 4** is registered to ANJELICA J LOPEZ VILLESICA at 6225 84th PL NE, Marysville, Washington.

Target Vehicle 5 (TV5): a 2012 black Lexus IS sedan bearing Washington license plate BSU8484 (hereinafter, “**Target Vehicle 5**”). According to the DOL **Target Vehicle 5** is registered to ENOC MARTINEZ-LOPEZ at 1610 N 26th St, Apt 101, Mount Vernon, Washington.

Target Vehicle 6 (TV6): a 2015 white Dodge Durango bearing Washington license plate BUJ0115 (hereinafter “**Target Vehicle 6**”). According to the DOL **Target Vehicle 6** is registered to Anjelica J LOPEZ VILLESICA at 1628 North 26th Street Apartment 205, Mount Vernon, Washington 98273.

Target Vehicle 7 (TV7): a 2017 black BMW 440i sedan, bearing Washington license plate CEN6820 (hereinafter “**Target Vehicle 7**”). According to the DOL **Target Vehicle 7** is registered to Manuel GARCIA-MUNOZ at 18111 25th Ave NE, Apt FF105, Marysville, Washington 98271.

Target Vehicle 9 (TV9): a 2016 Mercedes sedan, bearing Washington license plate CEX6393 (hereinafter “**Target Vehicle 9**”). According to the DOL **Target Vehicle 9** is registered to Dmytro Volodko at 184th Street Southwest Unit A409, Lynnwood, Washington 98037.

Attachment B

List of Items to be Searched for and Seized

This warrant authorizes the government to search for and seize the following items:

Evidence and/or fruits of the commission of the following crimes: Distribution and Possession with Intent to Distribute Controlled Substances, in violation of Distribution of, and Possession with Intent to Distribute, Controlled Substances, in violation of 21 U.S.C.

§ 841(a)(1); Conspiracy to Distribute, and to Possess with the Intent to Distribute, Controlled Substances, in violation of 21 U.S.C. §§ 841(a)(1) and 846, and Felon in Possession of a Firearm, in Violation of 18 U.S.C. 922, including but not limited to the following:

1. Controlled Substances: Including but not limited to marijuana and cocaine.
2. Drug Paraphernalia: Items used, or to be used, to store, process, package, use, and/or distribute controlled substances, such as plastic bags, cutting agents, scales, measuring equipment, tape, hockey or duffel bags, chemicals or items used to test the purity and/or quality of controlled substances, and similar items.
3. Drug Transaction Records: Documents such as ledgers, receipts, notes, and similar items relating to the acquisition, transportation, and distribution of controlled substances.
4. Customer and Supplier Information: Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, “pay/owe sheets” with drug amounts and prices, maps or directions, and similar items.
5. Cash and Financial Records: Currency and financial records, including bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, vehicle documents, and similar items; and other records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank drafts, cashiers checks, and similar items, and money counters.
6. Photographs/Surveillance: Photographs, video tapes, digital cameras, surveillance cameras and associated hardware/storage devices, and similar items, depicting property

occupants, friends and relatives of the property occupants, or suspected buyers or sellers of controlled substances, controlled substances or other contraband, weapons, and assets derived from the distribution of controlled substances.

7. Weapons: Including but not limited to firearms, magazines, ammunition, and body armor.

8. Codes: Evidence of codes used in the distribution of controlled substances, including but not limited to passwords, code books, cypher or decryption keys, and similar information.

9. Property Records: Deeds, contracts, escrow documents, mortgage documents, rental documents, and other evidence relating to the purchase, ownership, rental, income, expenses, or control of the premises, and similar records of other property owned or rented.

10. Indicia of occupancy, residency, and/or ownership of assets including, but not limited to, utility and telephone bills, canceled envelopes, rental records or payment receipts, leases, mortgage statements, and other documents.

11. Evidence of Storage Unit Rental or Access: rental and payment records, keys and codes, pamphlets, contracts, contact information, directions, passwords or other documents relating to storage units.

12. Evidence of Personal Property Ownership: Registration information, ownership documents, or other evidence of ownership of property including, but not limited to vehicles, vessels, boats, airplanes, jet skis, all terrain vehicles, RVs, and personal property; evidence of international or domestic travel, hotel/motel stays, and any other evidence of unexplained wealth,

13. Individual and business financial books, records, receipts, notes, ledgers, diaries, journals, and all records relating to income, profit, expenditures, or losses, such as:

a. Employment records: paychecks or stubs, lists and accounts of employee payrolls, records of employment tax withholdings and contributions, dividends, stock certificates, and compensation to officers.

b. Savings accounts: statements, ledger cards, deposit tickets, register records, wire transfer records, correspondence, and withdrawal slips.

c. Checking accounts: statements, canceled checks, deposit tickets, credit/debit documents, wire transfer documents, correspondence, and register records.

- d. Loan Accounts: financial statements and loan applications for all loans applied for, notes, loan repayment records, and mortgage loan records.
- e. Collection accounts: statements and other records.
- f. Certificates of deposit: applications, purchase documents, and statements of accounts.
- g. Credit card accounts: credit cards, monthly statements, and receipts of use.
- h. Receipts and records related to gambling wins and losses, or any other contest winnings.
- i. Insurance: policies, statements, bills, and claim-related documents.
- j. Financial records: profit and loss statements, financial statements, receipts, balance sheets, accounting work papers, any receipts showing purchases made, both business and personal, receipts showing charitable contributions, and income and expense ledgers.

14. All bearer bonds, letters of credit, money drafts, money orders, cashier's checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money wrappers, stored value cards, and other forms of financial remuneration evidencing the obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of money.

15. All Western Union and/or Money Gram documents and other documents evidencing domestic or international wire transfers, money orders, official checks, cashier's checks, or other negotiable interests that can be purchased with cash. These documents are to include applications, payment records, money orders, frequent customer cards, etc.

16. Negotiable instruments, jewelry, precious metals, financial instruments, and other negotiable instruments.

17. Documents reflecting the source, receipt, transfer, control, ownership, and disposition of United States and/or foreign currency.

18. Correspondence, papers, records, and any other items showing employment or lack of employment.

19. Telephone books, and/or address books, facsimile machines to include the carbon roll and/or other memory system, any papers reflecting names, addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile, and/or telex numbers, telephone records and bills relating to co-conspirators, sources of supply, customers, financial institutions, and

other individuals or businesses with whom a financial relationship exists. Also, telephone answering devices that record telephone conversations and the tapes therein for messages left for or by co-conspirators for the delivery or purchase of controlled substances or laundering of drug proceeds.

20. Safes and locked storage containers, and the contents thereof which are otherwise described in this document.

21. Tools: Tools that may be used to open hidden compartments in vehicles, paint, bonding agents, magnets, or other items that may be used to open/close said compartments.

22. Cell Phones: Cellular telephones and other communications devices including Blackberries, iPhones and other smartphones may be seized but may only be searched pursuant to a subsequent warrant.